

**In the Matter of:**  
*Joseph Mantha vs*  
*Quotewizard.com, LLC*

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*Justin C. Cohen*  
*September 15, 2020*

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Page 3

1 Volume: I  
2 Pages: 1 to 139  
3 Exhibits: 1 to 17  
4 UNITED STATES DISTRICT COURT  
5 FOR THE DISTRICT OF MASSACHUSETTS  
6 Civil Action No.: 1:19-CV-12235-LTS  
7 ----- x  
8 JOSEPH MANTHA, on behalf of himself  
9 and all others similarly situated,  
10 Plaintiffs,  
11 v.  
12  
13 QUOTEWIZARD.COM, LLC,  
14 Defendant.  
15 ----- x  
16 VIDEOCONFERENCE DEPOSITION OF JUSTIN C. COHEN  
17 Conducted Remotely  
18 September 15, 2020  
19 10:05 a.m. to 1:48 p.m.  
20 NELSON, MULLINS, RILEY & SCARBOROUGH, LLP  
21 One Post Office Square, 30th Floor  
22 Boston, Massachusetts  
23  
24 Reporter: Karen A. Interbartolo, RPR

1 INDEX  
2 EXAMINATION OF: PAGE  
3 JUSTIN C. COHEN  
4  
5 Direct Examination by Ms. Kingston 5  
6  
7  
8  
9 EXHIBITS  
10 No. Page  
11  
12 Exhibit 1 Subpoena for Mr. Cohen 5  
13 Exhibit 2 Subpoena for Blueflame 5  
14 Web Marketing  
15 Exhibit 3 SnappyAutoInsurance.com 5  
16 Auto Insurance Form  
17 Exhibit 4 SnappyAutoInsurance.com 5  
18 Terms of Use  
19 Exhibit 5 SnappyAutoInsurance.com 5  
20 Privacy Policy  
21 Exhibit 6 Subpoena for Mailgun 5  
22 Technologies, Inc.  
23 Exhibit 7 Subpoena Response from 5  
24 Mailgun Technologies, Inc.

Page 2

1 APPEARANCES:  
2  
3 THE LAW OFFICE OF EDWARD A. BRODERICK  
4 By Edward A. Broderick, Esquire  
5 208 Ridge Street  
6 Winchester, Massachusetts 01890  
7 (781) 721-1354  
8 ted@broderick-law.com  
9 Counsel for the Plaintiffs  
10  
11 NELSON, MULLINS, RILEY & SCARBOROUGH, LLP  
12 By Christine M. Kingston, Esquire  
13 One Post Office Square, 30th Floor  
14 Boston, Massachusetts 02109  
15 (617) 573-4714  
16 christine.kingston@nelsonmullins.com  
17 Counsel for the Defendant  
18  
19  
20  
21  
22  
23  
24

Page 4

1 EXHIBITS, Continued.  
2 No. Page  
3  
4 Exhibit 8 E-Mail dated 6/10/2020 5  
5 Exhibit 9 Subpoena for GoDaddy.com 5  
6 Exhibit 10 Shopper Info for Shopper 5  
7 ID 21183769  
8 Exhibit 11 Multiple E-Mails dated 5  
9 7/2020  
10 Exhibit 12 E-Mail dated 5/8/2020 5  
11 Exhibit 13 E-Mail for TCPA Request 5  
12 Exhibit 14 Three E-Mails 5  
13 Exhibit 15 Subpoena Response for 5  
14 Plural Marketing  
15 Exhibit 16 Subpoena Response for 5  
16 RevPoint  
17 Exhibit 17 Multiple E-Mails dated 5  
18 9/2/2020  
19  
20  
21  
22  
23  
24

<p style="text-align: right;">Page 5</p> <p>1 PROCEEDINGS</p> <p>2</p> <p>3 (Exhibit 1 through Exhibit 17</p> <p>4 pre-marked for identification.)</p> <p>5</p> <p>6 MS. KINGSTON: So, Ted, before we</p> <p>7 start, just the usual stip?</p> <p>8 MR. BRODERICK: Yes.</p> <p>9 MS. KINGSTON: Okay. So, for the</p> <p>10 record, all objections, besides as to form, are</p> <p>11 reserved until the time of trial, as well as motions</p> <p>12 to strike. The witness will have 30 days to read</p> <p>13 and sign the transcript. And I'm going to ask for</p> <p>14 notarization, so, Ted, unless you object --</p> <p>15 MR. BRODERICK: I have no objections.</p> <p>16</p> <p>17 JASON COHEN</p> <p>18</p> <p>19 having been satisfactorily identified and duly sworn</p> <p>20 by the notary public, was examined and testified as</p> <p>21 follows:</p> <p>22</p> <p>23 DIRECT EXAMINATION</p> <p>24 BY MS. KINGSTON:</p>	<p style="text-align: right;">Page 7</p> <p>1 Q. Can you please state your full name for the</p> <p>2 record?</p> <p>3 A. Justin Cohen.</p> <p>4 Q. And do you understand that you're under</p> <p>5 oath here today?</p> <p>6 A. Yes.</p> <p>7 Q. And do you understand that that means</p> <p>8 you're obligated to answer my questions fully and</p> <p>9 completely?</p> <p>10 A. Yes.</p> <p>11 Q. And you're obligated to answer them</p> <p>12 truthfully?</p> <p>13 A. Yes.</p> <p>14 Q. Are you on any medication today that would</p> <p>15 affect your ability to testify accurately?</p> <p>16 A. No.</p> <p>17 Q. Do you have any medical conditions that</p> <p>18 would affect your ability to testify accurately?</p> <p>19 A. No.</p> <p>20 Q. Have you ever been deposed before?</p> <p>21 A. No.</p> <p>22 Q. Did you do anything to prepare for this</p> <p>23 morning's deposition?</p> <p>24 A. I looked over what you sent. I mean it has</p>
<p style="text-align: right;">Page 6</p> <p>1 Q. All right. Good morning, Mr. Cohen. My</p> <p>2 name is Christine Kingston. I represent the</p> <p>3 defendant in this case the QuoteWizard.com, LLC.</p> <p>4 Good morning.</p> <p>5 A. Good morning.</p> <p>6 Q. I just have a couple of basic ground rules</p> <p>7 before we start. If at any point you don't</p> <p>8 understand a question that I've asked, just let me</p> <p>9 know. I'm happy to rephrase it.</p> <p>10 A. Okay.</p> <p>11 Q. Otherwise, I'll assume you understood the</p> <p>12 question. Okay?</p> <p>13 A. Yes.</p> <p>14 Q. Please only give oral and audible answers.</p> <p>15 Do you understand?</p> <p>16 A. Okay.</p> <p>17 Q. And at any time you need a break, just let</p> <p>18 me know. I'm happy to accommodate you.</p> <p>19 A. Okay.</p> <p>20 Q. And finally, since we are virtual, if at</p> <p>21 any point you're having an issue with your</p> <p>22 connection, you can't see me, you can't hear me,</p> <p>23 just let me know.</p> <p>24 A. Okay.</p>	<p style="text-align: right;">Page 8</p> <p>1 nothing to do with me, but I could just answer your</p> <p>2 questions.</p> <p>3 Q. And when you say it has nothing to do with</p> <p>4 you, what do you mean?</p> <p>5 A. Meaning SnappyAutoInsurance, just all your</p> <p>6 exhibits and everything, I never owned the site.</p> <p>7 Never did. My name was on the site, but -- I'm not</p> <p>8 sure why. And as far as Adam Brown goes, I know he</p> <p>9 sold this site along with his old company</p> <p>10 Offervision years ago, so I haven't seen the site</p> <p>11 in, I don't know, at least five years.</p> <p>12 So something from 2018, your screen</p> <p>13 captioning has nothing -- I'm not even associated</p> <p>14 with it. I don't even think that he is anymore</p> <p>15 because he sold off the company that owned the site,</p> <p>16 so -- a long time ago.</p> <p>17 Q. And when you mentioned Snappy, you're</p> <p>18 talking about www.snappyautoinsurance.com, correct?</p> <p>19 A. Correct. The exhibit you sent over,</p> <p>20 correct.</p> <p>21 Q. And you said that you've never owned that</p> <p>22 website?</p> <p>23 A. I have not. And I seen your privacy. It</p> <p>24 says -- It goes to adamb1140@gmail. My name is not</p>

Page 9

1 Adam. I never owned the site. I understand my  
2 company was on there. Perhaps we did something with  
3 the site years ago and never took it down, but I  
4 don't own the site and never have.

5 **Q. When you say own, do you mean paying for**  
6 **the domain name?**

7 A. Yeah, paying for the domain name or  
8 building the site. It had nothing to do with me.

9 **Q. So you didn't ever pay for the domain name?**

10 A. No.

11 **Q. And you didn't build the site?**

12 A. No.

13 **Q. Did you ever run it?**

14 A. No.

15 **Q. Did you ever have any involvement in**  
16 **running it?**

17 A. Years ago we tested it. I don't even  
18 remember how long ago. So, yes, with Adam, we built  
19 a bunch of sites. You know, we had thousands of  
20 sites combined, and this site was something we  
21 tested. It never worked and took it down. But I  
22 believe he might have given it as a package when he  
23 sold his old company Offervision to another network,  
24 which was prior to these screen shots, from what I

Page 10

1 understand.

2 **Q. So Adam Brown's company was called**  
3 **Offervision?**

4 A. Yes, but he sold that -- I don't remember  
5 what year -- a few years ago to another affiliate,  
6 another company that's still in business. I don't  
7 know. You'd have to ask him that.

8 **Q. And is your understanding when he sold**  
9 **Offervision, he sold the websites that he was**  
10 **operating?**

11 A. Correct.

12 **Q. And that would include Snappy?**

13 A. I believe so. I mean you'd have to ask  
14 him, but I'm pretty sure that was one of them. The  
15 site's not even up anymore.

16 **Q. What site's not up anymore?**

17 A. As far as I know, SnappyAutoInsurance, at  
18 least the last time I looked when you guys first  
19 reached out to me.

20 **Q. Do you know when it was last operational?**

21 A. I have no clue. I haven't done anything  
22 with the site in years.

23 **Q. When is the last time that you had**  
24 **involvement in the site?**

Page 11

1 A. Since we just tested it and it never went  
2 anywhere. I don't recall the exact, but I would say  
3 around 2015.

4 **Q. What do you mean by tested it?**

5 A. As far as like putting offers on it and  
6 just work with -- I work closely with Adam on  
7 certain things, so I'm just seeing if it would work,  
8 like selling the lease to auto insurance companies  
9 or whatever was on it at the time. It was just a  
10 failed project, so it never went anywhere.

11 **Q. And why do you describe it as a failed**  
12 **project?**

13 A. It wasn't making money.

14 **Q. Is it fair to say that you were running it**  
15 **with Adam Brown?**

16 A. No.

17 **Q. So it was just Adam Brown running the**  
18 **website with some of your help?**

19 A. I helped create the site. We have many  
20 auto insurance sites. As far as this site goes, I  
21 don't recall it. As far as running it, we have  
22 probably 50 different auto insurance sites. This is  
23 one that just never took off. I worked closely with  
24 Adam. I did not create anything, but we talked hand

Page 12

1 in hand and tried to collaborate on projects all the  
2 time. This is a project that just never went  
3 anywhere.

4 **Q. And I think you said that it wasn't making**  
5 **money, right?**

6 A. Yes.

7 **Q. So how long were you guys running it that**  
8 **you determined that it just wasn't making money?**

9 A. I mean we usually give it at least a few  
10 months. It's been so long. I don't know the exact  
11 time.

12 **Q. Okay. In terms of preparing for today's**  
13 **deposition, you looked over what I sent you; is that**  
14 **correct?**

15 A. Me?

16 **Q. Yes.**

17 A. Yes. I have it open on my screen now, yes.

18 **Q. Did you look at anything else?**

19 A. Just what you sent.

20 **Q. You didn't review any other documents?**

21 A. I mean when I originally -- I mean a long  
22 time ago I reviewed documents, whatever you guys  
23 sent to me like via signature or something that was  
24 delivered to my house, but -- I look at this stuff,

Page 13

1 honestly, but I just don't have -- I really don't  
2 have any answers for you, so I just browsed over it.  
3 I don't know anything about the site further than  
4 what I said.

5 **Q. So, to your knowledge, before today's**  
6 **deposition, you've only looked at documents that**  
7 **were sent from my office; is that correct?**

8 A. I believe. Whatever lawyer's sending them.  
9 Honestly, I don't look at who's sending them. You  
10 know, I just read it. And when I see  
11 SnappyAutoInsurance, I browse over it and I -- I  
12 don't have an answer for you, so I don't know what  
13 to tell you.

14 **Q. Did you speak with anyone in preparing for**  
15 **today's deposition?**

16 A. No. I did not need to.

17 **Q. You didn't speak with Adam Brown?**

18 A. I spoke with him about the site before,  
19 yes, but not today.

20 **Q. When is the last time you spoke with him**  
21 **about the website?**

22 A. Probably when I booked this depo. So  
23 whatever date that was. I talk to Adam daily. We  
24 do other stuff together, but it's just not -- I

Page 14

1 asked him about this and I said, "I'm going to  
2 schedule a deposition," and probably the last time I  
3 saw --

4 We don't really talk about the site because  
5 he doesn't know anything further. He said he  
6 believed he probably had sold it off when he sold  
7 his own company, so I guess when you speak to him,  
8 he'll know more than me about that. I was not  
9 involved in that sale.

10 **Q. So that conversation would have been a**  
11 **couple of weeks ago?**

12 A. Yes.

13 **Q. Okay. And did he give you any idea about**  
14 **the last time that he accessed the website?**

15 A. No. He said he was going to look. He said  
16 he doesn't even remember either. So he said he  
17 hasn't looked. His last thing was, I think the site  
18 might have been sold off when he sold his company.  
19 That's the last we spoke about it.

20 **Q. And I know you said you think that was a**  
21 **couple of years ago that he sold to Offervision?**

22 A. Yeah. He'll know the exact date. I don't  
23 know.

24 **Q. In terms of estimating, do you think it was**

Page 15

1 **in the last three years?**

2 A. Longer.

3 **Q. So the last five years?**

4 A. Yes. I know there's like an article about  
5 it that he said he had to look up through just the  
6 other company announcing the acquisition, so he's  
7 got to --

8 **Q. And have you had any other conversations**  
9 **with Adam Brown about SnappyAutoInsurance.com?**

10 A. Just what I told you. No, that's it.

11 **Q. So just that conversation a couple of weeks**  
12 **ago?**

13 A. Yes.

14 **Q. No other prior conversations with Adam**  
15 **Brown?**

16 A. Maybe when he first started getting e-mails  
17 from you guys just saying what is this about and we  
18 didn't own the site, but that's really it.  
19 Basically what I'm telling you is we don't remember  
20 even the last time the site was used or when we went  
21 to it it was even up anymore, so --

22 **Q. And when was that that you visited and you**  
23 **didn't see it was up?**

24 A. When you guys first started contacting us,

Page 16

1 so whenever that was.

2 **Q. Do you remember the last time that you went**  
3 **to the website and it was operational?**

4 A. No. Probably 2015.

5 **Q. Did you access the site in 2019?**

6 A. I tried to go to it when you guys sent  
7 me -- Oh, no. That was 2020. So, no.

8 **Q. You didn't log on or otherwise access the**  
9 **website in 2019?**

10 A. Unless you guys sent me something then.  
11 Whatever -- I tried to look as soon as you guys sent  
12 me something, so whatever date that was.

13 **Q. Do you have any knowledge of who currently**  
14 **owns the website?**

15 A. I do not.

16 **Q. Did you ask Mr. Brown if he knew?**

17 A. No. I was just more concerned if we did  
18 anything or had anything on the site. And we don't  
19 recall or haven't used the site in years, and he  
20 confirmed that with me as well.

21 **Q. Is there any way for you to verify when you**  
22 **last used the site?**

23 A. I have no record of the site anymore, no.  
24 If we have sites that don't work out or that we

<p style="text-align: right;">Page 17</p> <p>1 don't use anymore, we just delete it or just move                  2 on. We don't -- especially if it's something that I                  3 don't even own.                  4 On my sites that I personally own, if it                  5 doesn't work out, I usually leave it up or I just do                  6 whatever with it. I don't know how whoever -- I see                  7 it here Adam owned it last. So I'm not sure how he                  8 stores his files, but I don't have anything related                  9 to the site.                  10 <b>Q. So you spoke with Adam Brown a couple of</b>                  11 <b>times before this deposition. Did you speak with</b>                  12 <b>anyone else about it?</b>                  13 A. Just counsel, just showing them. And                  14 that's really it.                  15 <b>Q. Okay. So you have an attorney?</b>                  16 A. Multiple attorneys that we work with, but,                  17 you know, I showed them what was going on.                  18 <b>Q. And what are your attorneys' names?</b>                  19 A. I mean I'd rather that the -- Dana                  20 Josephson, but then I have a few other attorneys,                  21 but -- I basically use them for advice, just, you                  22 know -- I didn't have to put a retainer on this.                  23 They said it was unnecessary.                  24 <b>Q. Do you know someone named George Rios?</b></p>	<p style="text-align: right;">Page 19</p> <p>1 <b>my office and with plaintiffs' attorneys, right?</b>                  2 A. Correct. Whoever sent me stuff.                  3 <b>Q. Have you ever had any phone calls with</b>                  4 <b>plaintiffs' counsel?</b>                  5 A. No. Not that I know of, at least. I mean                  6 I've had one or two phone calls during this whole                  7 thing, but I don't even know who I spoke with, which                  8 side, whoever called me.                  9 <b>Q. So you remember it was attorneys?</b>                  10 A. Yeah. I think from Massachusetts the phone                  11 number was, so whoever's office was there.                  12 <b>Q. And do you remember the substance of those</b>                  13 <b>calls?</b>                  14 A. Just at the beginning just asking me                  15 the same stuff you're asking me about now, but I                  16 don't -- That's it.                  17 <b>Q. And do you recall what you spoke about?</b>                  18 A. I think they were asking me about the site                  19 SnappyAutoInsurance, my involvement or whatever it                  20 may be. I don't remember.                  21 <b>Q. And do you recall what you said?</b>                  22 A. Probably the same thing I'm saying now,                  23 that I don't know or I'd have to look into it                  24 because, at that time, I said I probably have to</p>
<p style="text-align: right;">Page 18</p> <p>1 A. No clue.                  2 <b>Q. You never heard that name?</b>                  3 A. No.                  4 <b>Q. Have you ever heard of a company called</b>                  5 <b>Plural Marketing?</b>                  6 A. Never. Never worked with them.                  7 <b>Q. Have you ever heard of them?</b>                  8 A. No, I never even heard of them.                  9 <b>Q. Have you heard of someone named Dario</b>                  10 <b>Osmancevic?</b>                  11 A. No.                  12 <b>Q. What about Michael Berger?</b>                  13 A. No.                  14 <b>Q. Have you heard of a company called Fenix</b>                  15 <b>Media, F-E-N-I-X?</b>                  16 A. I've heard of Blue Phoenix but not Fenix.                  17 <b>Q. Did you discuss this case with plaintiff</b>                  18 <b>Joe Mantha's attorneys?</b>                  19 A. No. I don't even know who that is besides                  20 in the stuff you sent me.                  21 <b>Q. So you've had a few e-mails with both my</b>                  22 <b>office and with plaintiffs' attorneys, right?</b>                  23 A. Sorry. What did you say?                  24 <b>Q. You've had some e-mail exchanges with both</b></p>	<p style="text-align: right;">Page 20</p> <p>1 look into it because I didn't even know what was                  2 going on, but that's really it.                  3 <b>Q. Have you ever provided any documents to any</b>                  4 <b>lawyers in this case?</b>                  5 A. No. Just -- My wife works at a law firm,                  6 and we -- I've just asked for advice but nothing --                  7 it's not needed -- not necessary.                  8 <b>Q. So part of the subpoena included document</b>                  9 <b>requests; are you aware of that?</b>                  10 A. I am. I just have nothing to give you.                  11 Hold on one second.                  12 (Pause.)                  13 A. Yeah, I mean whatever -- I saw lots of                  14 documents. I don't have anything to give you. I                  15 don't know anything about this site.                  16 <b>Q. So we'll go over those later, but you're</b>                  17 <b>aware there were document requests in the subpoena,</b>                  18 <b>correct?</b>                  19 A. Yes.                  20 <b>Q. And you have not compiled or prepared any</b>                  21 <b>documents in response?</b>                  22 A. I don't have anything to prepare. I don't                  23 have anything about the site.                  24 <b>Q. Are you currently employed?</b></p>



<p style="text-align: right;">Page 21</p> <p>1 A. Yes.</p> <p>2 <b>Q. And who's your employer?</b></p> <p>3 A. A few. I have -- You know, I have my own</p> <p>4 company.</p> <p>5 <b>Q. What's your company called?</b></p> <p>6 A. Blueflame Web Marketing.</p> <p>7 <b>Q. Any other companies that you have?</b></p> <p>8 A. No. I do consulting. I do consulting for</p> <p>9 companies but not that I own.</p> <p>10 <b>Q. And you're an officer of Blueflame Web</b></p> <p>11 <b>Marketing, LLC, correct?</b></p> <p>12 A. Yes.</p> <p>13 <b>Q. Are you the sole officer?</b></p> <p>14 A. Yes.</p> <p>15 <b>Q. Does Blueflame have any employees?</b></p> <p>16 A. Not right now.</p> <p>17 <b>Q. And what does Blueflame Web Marketing do?</b></p> <p>18 A. Consulting and, you know, we do on-line</p> <p>19 marketing, provide leads for clients.</p> <p>20 <b>Q. So fair to say lead generation?</b></p> <p>21 A. Yeah, lead generation and just overall</p> <p>22 consulting on how to lower costs per lead for</p> <p>23 companies.</p> <p>24 <b>Q. Does Blueflame currently own or operate any</b></p>	<p style="text-align: right;">Page 23</p> <p>1 someone needs leads for plumbing, we make a site for</p> <p>2 the plumber and direct leads for them. It just</p> <p>3 depends. It's other companies. There are window</p> <p>4 tint shops. They're different type of businesses</p> <p>5 that we build sites for general leads based on the</p> <p>6 client's needs and the area.</p> <p>7 <b>Q. What about auto insurance; do you have any</b></p> <p>8 <b>active websites for that?</b></p> <p>9 A. No, not for any insurance.</p> <p>10 <b>Q. You're not doing any auto insurance?</b></p> <p>11 A. Well, it would help -- I'd have to look</p> <p>12 through my portfolio, but I don't think we have -- I</p> <p>13 mean we might have auto insurance, but it sounds</p> <p>14 like we're not running any right now.</p> <p>15 <b>Q. When you say run the website, what do you</b></p> <p>16 <b>mean by that?</b></p> <p>17 A. When we have a client who wants leads, then</p> <p>18 we can generate leads based on what they need, what</p> <p>19 state they're in, and what they're doing. You know,</p> <p>20 sometimes we build a site custom for them. So, like</p> <p>21 I said, if we have a plumber, we'll build them a</p> <p>22 site or a locksmith and we'll build them a site and</p> <p>23 generate leads for them, you know, local or</p> <p>24 nationally depending on what they need.</p>
<p style="text-align: right;">Page 22</p> <p>1 <b>websites?</b></p> <p>2 A. I mean, yeah, we have a -- Nothing -- Yeah.</p> <p>3 I mean we have a bunch of websites that we own and</p> <p>4 operate but nothing related to this site though.</p> <p>5 <b>Q. Do you know how many websites?</b></p> <p>6 A. Maybe 10 or 20. They're all active, but</p> <p>7 it's just what we have, you know, that we use.</p> <p>8 <b>Q. How many right now?</b></p> <p>9 A. Active, probably like eight sites that</p> <p>10 are -- we're running right now.</p> <p>11 <b>Q. Do you know the names of the eight active</b></p> <p>12 <b>websites?</b></p> <p>13 A. I'd have to look. I don't know. I mean</p> <p>14 they're not related to this.</p> <p>15 <b>Q. Do you recall any of the names off the top</b></p> <p>16 <b>of your head?</b></p> <p>17 A. Yeah, but they're not related to any of</p> <p>18 this.</p> <p>19 <b>Q. I understand, you know, they're not related</b></p> <p>20 <b>to Snappy, but I'm just asking you if you recall the</b></p> <p>21 <b>names of the websites.</b></p> <p>22 A. I have my Blueflame Web Marketing which is</p> <p>23 my main site. And then it just really depends on</p> <p>24 what kind of consulting or business we have. If</p>	<p style="text-align: right;">Page 24</p> <p>1 <b>Q. So these are websites for business</b></p> <p>2 <b>specifically, not a website where a consumer could</b></p> <p>3 <b>sign up for a quote, for example?</b></p> <p>4 A. Yeah. It depends. I mean sometimes if we</p> <p>5 have a client who wants health insurance and they</p> <p>6 want X amount of leads, their health insurance agent</p> <p>7 or company will generate leads for them and we'll</p> <p>8 sell it to the highest bidder. It depends -- It</p> <p>9 really depends what we do. We've been doing this</p> <p>10 since 2008. A lot of stuff changes.</p> <p>11 <b>Q. Have you ever used a lead Nomics?</b></p> <p>12 A. What did you say, a lead what? Sorry.</p> <p>13 <b>Q. Nomics, N-O-M-I-C-S.</b></p> <p>14 A. I've heard of them. I don't know if</p> <p>15 they're still around. I might have worked with them</p> <p>16 in the past years ago.</p> <p>17 <b>Q. Do you know what they do?</b></p> <p>18 A. I think they're like EDU or something.</p> <p>19 <b>Q. EDU, what's that?</b></p> <p>20 A. Education leads. I don't remember. I've</p> <p>21 heard the name, but I don't know if they're still</p> <p>22 around.</p> <p>23 <b>Q. What service do they provide relative to</b></p> <p>24 <b>lead generation?</b></p>

Page 25

1 A. They would just buy leads.  
2 **Q. They buy leads?**  
3 A. Mm-hmm.  
4 **Q. Do they buy and sell leads that have**  
5 **already been generated?**  
6 A. I believe so. I'm not -- I don't know  
7 their model exactly, but I think they -- From what I  
8 recall, I think they're -- they have a form and they  
9 buy leads. Like we can promote leads -- promote  
10 their ads, and they buy leads.  
11 **Q. What about All Web Leads; have you heard**  
12 **about them?**  
13 A. All Web Leads, yes. I think they do like  
14 auto insurance, like paperclip stuff, I think.  
15 **Q. What do you mean by that?**  
16 A. They just have pages of all auto insurance  
17 like offers that you can choose from, I believe. I  
18 don't even know if they're still around either. I  
19 haven't heard that name in a while.  
20 **Q. Have you ever worked with All Web Leads?**  
21 A. Years ago. Not in the past few years. I  
22 don't even know like if they're still in business.  
23 **Q. Do you know if All Web Leads was ever**  
24 **connected to SnappyAuto?**

Page 26

1 A. I have no clue. It's possible. They were  
2 very big in the space. They were on every site.  
3 **Q. Okay. I guess I'm a little confused about**  
4 **All Web Leads. So you said they provide auto**  
5 **insurance offers?**  
6 A. I think so. From what I remember, if I'm  
7 thinking of the right company, yeah. And I think  
8 they have just like their own platform where they  
9 just display companies looking for auto insurance.  
10 I think they work directly with like a GEICO or  
11 State Farm, and they promote -- they have their ads  
12 on the site, from what I recall. I think that's All  
13 Web Leads. I'm not sure how their platform looks.  
14 **Q. So you said you think you've worked with**  
15 **them in the past?**  
16 A. Yeah.  
17 **Q. And what service would they have provided**  
18 **to you?**  
19 A. Same thing. Probably buying leads. Like  
20 if we generated an insurance lead, they would  
21 probably just buy the leads from us.  
22 **Q. When you sell leads, do you have contracts**  
23 **with the people or companies you're selling leads**  
24 **to?**

Page 27

1 A. Yes. Or they provide a contract.  
2 **Q. Would you ever sell a lead where there**  
3 **wasn't a contract in place?**  
4 A. No, because everything is -- There's an IO  
5 signed for everything. Usually the company provides  
6 one and usually they'll want their name on the site,  
7 et cetera, you know, do they need to be on the  
8 privacy policy, do they need to be on the opt-in so  
9 they know, you know, for instance, if they're going  
10 to be getting a phone call. It should say that you  
11 might be receiving a call from X. I don't know the  
12 term. Usually they have legal write a letter. But  
13 their site usually writes it up what needs to be  
14 placed on the site.  
15 **Q. So I think you're talking about where**  
16 **you're running a website specifically for a company,**  
17 **right?**  
18 A. Yeah. Even on our own site, they say you  
19 need to have in the terms of use or you need to have  
20 in the privacy policy or the opt-in certain  
21 language, and they provide the language that you're  
22 going to be receiving a call from XYZ Company and by  
23 submitting this lead you agree to, you know --  
24 basically just an opt-in so they're agreeing to the

Page 28

1 terms of the site and who might be calling them just  
2 for legal purposes.  
3 **Q. Have you ever run a website where the leads**  
4 **were sold to multiple companies?**  
5 A. No. I mean as far as after we sell it to a  
6 company, what they do with it we can't control, but  
7 we don't sell it, no. Most companies only want to  
8 buy one lead.  
9 **Q. I think my question was a little confusing.**  
10 **I don't mean selling one lead to multiple companies.**  
11 **I mean that a website might generate many leads, and**  
12 **those leads are sold to various companies.**  
13 A. Yeah. A lot of sites do that.  
14 **Q. Have you ever run a website like that?**  
15 A. Sure. I've run a ton of websites like  
16 that, I mean for other people, for myself. I don't  
17 know if I've been -- that's been -- doing that since  
18 2005, you know, since I started in this industry for  
19 companies I've worked for. That's how everyone does  
20 it.  
21 **Q. And that's how Snappy worked, right?**  
22 A. I would assume so. I mean most lead  
23 aggregator sites sell it to the highest bidder.  
24 **Q. And you used the term "lead aggregator."**



<p style="text-align: right;">Page 29</p> <p><b>1 Can you just kind of give me a kind of definition of</b>  <b>2 that?</b></p> <p>3 A. Basically multiple companies are looking          4 for the same auto insurance form or whatever the          5 vertical is. And after it's filled out, in real          6 time, whoever bids the highest price for that lead          7 buys the lead. So if it sells for \$5, \$10, \$50. It          8 depends. Whoever outbids. They just bid on it and          9 buy it. Same way a car dealer would get a lead, you          10 know, real time leads.</p> <p><b>11 Q. And for lead aggregator websites, were</b>  <b>12 there contracts with the highest bidders?</b></p> <p>13 A. Contracts with everyone.</p> <p><b>14 Q. So how does that work? Is this -- I mean</b>  <b>15 in order to bid, does a company need to have a</b>  <b>16 contract?</b></p> <p>17 A. Well, anyone working with a company, you'd          18 sign a contract first because you'd want to get paid          19 and you'd want to make sure that they're abiding and          20 they're in your terms of service or whatever they          21 need to be in for the site.</p> <p><b>22 Q. So, for example, just for SnappyAuto, if</b>  <b>23 there was a lead generated from that website, anyone</b>  <b>24 who was going to bid would have to have a contract</b></p>	<p style="text-align: right;">Page 31</p> <p>1 works. One company -- Unless you're the main          2 company, a lot of people are just basically middle          3 men and help who have the skills to be able to get          4 to the website shown and generate leads, and then          5 from there the lead aggregators do what they need to          6 do.</p> <p><b>7 Q. So, in that scenario, would there be a</b>  <b>8 contract in place between the lead aggregator</b>  <b>9 website and All Web Leads?</b></p> <p>10 MR. BRODERICK: Objection.</p> <p>11 A. I don't know. I mean I assume so.</p> <p><b>12 Q. Well, have you ever run a website where you</b>  <b>13 worked with All Web Leads in that manner?</b></p> <p>14 A. I don't even -- I'd have to go to their          15 website. I think they're just like a paper hook          16 platform. I'm just using them as an example. I          17 just deal with the driving traffic to the site.          18 That's what I do. I don't know what much -- what          19 goes on after that.</p> <p><b>20 Q. Was that your role relative to</b>  <b>21 SnappyAuto.com?</b></p> <p>22 MR. BRODERICK: Objection.</p> <p>23 A. Probably. That's my role with everything.          24 I just drive traffic to websites. I'm good at paid</p>
<p style="text-align: right;">Page 30</p> <p><b>1 in place; is that accurate?</b></p> <p>2 MR. BRODERICK: Objection.</p> <p>3 A. I don't know. It's not my site. I can't          4 answer for that.</p> <p><b>5 Q. Speaking just more generally for lead</b>  <b>6 aggregator websites, is that accurate to say?</b></p> <p>7 A. Most likely, unless you work with a company          8 like All Web Leads like you mentioned or one of          9 those who have -- these companies that say you just          10 sign one contract with them and then they're sending          11 it to 50 different people, but you can't control          12 that. That's how it happens. A big company like          13 that will buy it and they'll send it out to multiple          14 people.</p> <p><b>15 Q. So, in that scenario, All Web Leads would</b>  <b>16 be kind of an intermediary between the website and</b>  <b>17 bidders?</b></p> <p>18 A. Yeah. I'm just using them as an example,          19 but that's usually how it works. That's why these          20 companies will just be the in-between. They'll buy          21 for \$10 and then they'll go and sell to the highest          22 bidder. You don't deal with that part.</p> <p><b>23 Q. So All Web Leads would actually --</b>  <b>24 A. I'm just saying like that's usually how it</b></p>	<p style="text-align: right;">Page 32</p> <p>1 search and SEO and I get traffic to sites. That's          2 mainly what I do, consulting.</p> <p><b>3 Q. Can you break that down for me a little</b>  <b>4 bit? You said paid search?</b></p> <p>5 A. You know, like advertising, Google,          6 Facebook, et cetera.</p> <p><b>7 Q. So making sure that the website is kind of</b>  <b>8 prominently featured?</b></p> <p>9 A. Yes.</p> <p><b>10 Q. And I think you mentioned SSO?</b></p> <p>11 A. What's that?</p> <p><b>12 Q. I thought you mentioned either SEO or SSO.</b></p> <p>13 A. Oh, SEO, yes. Search engine optimization.          14 I don't think Snappy ever ran like paid search. It          15 would have been in a Google account or something.          16 I've never seen it. I don't think it's relative to          17 this.</p> <p><b>18 Q. You don't think Snappy ran a paid search?</b></p> <p>19 A. No. It might have done some -- got traffic          20 somewhere else, but I don't -- I never ran this in          21 Google, so --</p> <p><b>22 Q. And how do you know that you didn't?</b></p> <p>23 A. Just looking through these active Google ad          24 accounts, I don't see the site anywhere as a pause</p>

Page 33

1 site or deleted site when I look.

2 **Q. So if you had done paid searches for**  
3 **Snappy, you would see that in your Google search**  
4 **account?**

5 A. That I would see, yeah, because it would be  
6 deleted or just paused, but it doesn't even exist in  
7 there.

8 **Q. What about SEO services; is there a way**  
9 **to -- for you to find out if you did that for**  
10 **Snappy?**

11 A. No. These type of sites, they don't do SEO  
12 on these kind of sites. If you have like a window  
13 tint shop and you wanted to get presence in the  
14 local area of the shop, if someone looks out their  
15 window tint, we do like that type of SEO for local  
16 businesses, not lead generation sites. Too  
17 competitive. People dump millions of dollars into  
18 that. We can't do that. Like the Quote Wizard.

19 **Q. What does a site like Snappy do to drive**  
20 **traffic to the website?**

21 A. Probably e-mail marketing, if I had to  
22 guess.

23 MR. BRODERICK: Objection.

24 **Q. E-mail marketing?**

Page 34

1 A. Yeah.

2 **Q. And what would that entail?**

3 MR. BRODERICK: Objection.

4 A. More affiliate traffic. Most likely it was  
5 either an e-mail or an affiliate site. Where other  
6 people promote traffic to it, you just have to abide  
7 by the site terms and conditions. A lot of sites  
8 I've done with Adam in the past, affiliate traffic,  
9 we pay affiliates to drive the traffic for the site.  
10 For this site, I'm not sure.

11 **Q. With affiliate traffic, is that typically a**  
12 **website also working in the same context --**

13 A. It's not a website. It would just be  
14 people who work as affiliates to promote Snappy,  
15 yes. They could be selling traffic directly to it.  
16 They could just have a banner on their site saying,  
17 you know, SnappyAuto and they click on the banner.  
18 It could come from multiple ways. Like I said, I  
19 don't know with this site.

20 **Q. And you mentioned e-mail marketing too,**  
21 **correct?**

22 MR. BRODERICK: Objection.

23 A. That's something that people do, yes, but I  
24 don't know, once again, what this site does or did.

Page 35

1 **Q. Can you give me an idea of what that**  
2 **entails?**

3 A. People send out e-mails to people who opted  
4 into a list that wanted to receive information  
5 about, in this example, auto insurance, but, like I  
6 said, I don't know what this site did.

7 **Q. I just want to make sure I'm understanding**  
8 **you correctly. So e-mail marketing is where**  
9 **someone's -- a consumer has already opted in to**  
10 **receive information?**

11 MR. BRODERICK: Objection.

12 A. Correct.

13 **Q. And so that the e-mail would say, okay, if**  
14 **you want information, you can go to use -- you're**  
15 **just using Snappy, go to SnappyAuto.com?**

16 MR. BRODERICK: Objection.

17 A. I don't -- It's e-mail marketing. It's  
18 basically someone's e-mailing an ad, and that's --  
19 Whatever -- If it was Snappy, they would e-mail it  
20 to a SnappyAutoInsurance affiliate. I don't know.  
21 This site, I have no clue what went on with it.

22 **Q. I'm just trying to understand more**  
23 **generally, but if someone is receiving that e-mail,**  
24 **are you saying that they've already signed up to**

Page 36

1 **receive information at that point?**

2 MR. BRODERICK: Objection.

3 A. That's how e-mail marketing works, I mean,  
4 but --

5 **Q. At some point, you're going to have to kind**  
6 **of educate us a little bit because this isn't what**  
7 **we do. So we're kind of relying on you to --**

8 A. If you go on Macys.com and submit to  
9 receive their e-mails or their partners' e-mails,  
10 then you're going to start receiving e-mails from  
11 Macy's and their affiliated partners. If you go on  
12 a certain website and you agree to receive e-mails  
13 from them and they're affiliated partners, one of  
14 our websites or any website is an affiliated  
15 partner, then they have permission to e-mail about  
16 insurance or whatever it may be. That's basically  
17 what e-mail marketing is.

18 **Q. Do you know if Snappy had any affiliated**  
19 **partners or websites?**

20 A. I know nothing about Snappy besides that  
21 was a project years ago. You can ask me all day  
22 long about these questions. I don't have an answer.

23 **Q. So you said that typically what you do is**  
24 **drive traffic to a website, correct?**

Page 37

1 A. Correct.  
2 **Q. Is that the service you would have provided**  
3 **for Snappy?**  
4 A. No.  
5 MR. BRODERICK: Objection.  
6 **Q. I'm sorry. I didn't hear your answer.**  
7 A. No. That's my main thing is what I do, but  
8 I also try to build websites and we do other stuff.  
9 This was just a project we were trying to push to  
10 affiliates or something and it just didn't work.  
11 **Q. So what exactly --**  
12 A. Affiliate sites I don't do SEO for. This  
13 is just more a lead generated site, is what this  
14 looks like. I don't know how it was used or what  
15 it's used for.  
16 **Q. So what did you provide for Snappy?**  
17 A. We probably provided advice on how to build  
18 a site and what we should do to promote it and  
19 probably try to promote it in some way or form and  
20 it just never worked out or there was not enough  
21 fires on the back end so it was just a failed  
22 project.  
23 Basically we just built the site, tried to  
24 get the partners like on the back end of the site,

Page 38

1 and I don't think it really was profitable or we  
2 weren't able to get enough people and just gave up  
3 on the project, is what I'm guessing. I don't know.  
4 It's years ago.  
5 **Q. But you have a pretty clear memory that, in**  
6 **your words, this site, I think you said, failed?**  
7 A. I don't have a clear memory of it, but I  
8 have -- I mean if my name is on the site and I don't  
9 recall it, I'm sure it was probably a failed  
10 project. And Adam doesn't recall it. Obviously if  
11 it was a site making money and doing well, it would  
12 still be around. The site's not even in my name, so  
13 I don't have record of anything.  
14 **Q. I'm just trying to understand your**  
15 **testimony. So you don't remember --**  
16 A. All I'm saying is the site name sounds  
17 familiar, but we have other sites named Snappy or  
18 there's millions of other sites named Snappy  
19 something, but I don't recall the site. It was  
20 never registered to me in my register and I don't  
21 have anything on my servers or data or anything for  
22 that site. I don't have -- There's nothing I can  
23 really provide.  
24 I guess my name is somehow in a privacy

Page 39

1 policy or wherever you guys found it, but you know  
2 what, it's the same way with Quote Wizard or anyone  
3 else. People who put companies' names on there  
4 because they're affiliated with them doesn't mean  
5 they're involved in the site. Or maybe at some  
6 point maybe they were involved in the site but they  
7 never deleted it. I can't control what's on a site  
8 especially when I don't own it.  
9 **Q. For the purposes of the court reporter,**  
10 **it's just important that you let me finish my**  
11 **question and I'll do my best to let you finish your**  
12 **answer so we're not talking over each other. Okay?**  
13 **So what I understand from your testimony is**  
14 **you don't have any memories of this website**  
15 **specifically; is that accurate?**  
16 A. Yes.  
17 **Q. And when you say that you think it failed,**  
18 **you're saying that because you no longer use it and**  
19 **that's your assumption; is that accurate?**  
20 A. Yes. Or have any record of the site or  
21 ownership of the site.  
22 **Q. All right. If leads were ever sold from**  
23 **SnappyAuto, who would have those records?**  
24 A. Probably whoever they sold them to. I

Page 40

1 don't know. I don't know how they ran their back  
2 end of the site. I don't have access to it or --  
3 This is something from years ago. I don't know.  
4 **Q. And I think you mentioned that you've built**  
5 **a couple of lead aggregation sites?**  
6 A. I mean I've built many through the past 12  
7 or 14 years. You know, some of them are probably  
8 still up that I don't even remember. Some of them  
9 are down. I don't -- Yes, of course, but I don't --  
10 Since I've -- I think the first one I built was in  
11 2005. I've been building them. Some of them just  
12 expire, some go down, some are successful, some of  
13 them aren't. Nature of the game.  
14 **Q. I'm speaking generally here. Can you give**  
15 **me an idea when you build a site what happens on**  
16 **what you refer to as the back end?**  
17 A. Yeah. Usually if we have clients, like,  
18 for example, a locksmith that we have two or three  
19 locksmiths who want leads, we'll build a website  
20 about locksmiths and either we'll generate leads for  
21 them, or if the locksmiths are paying anywhere from  
22 \$12 to \$15 a lead, we'll go out there and look for  
23 affiliates and say, we'll give you \$9 a lead. We'll  
24 make a few dollars on the back end and let someone

Page 41

1 else generate it for us. I mean that's kind of how  
2 the model works.

3 **Q. And, speaking generally, what happens on**  
4 **the back end when a lead is sold?**

5 A. In this case, a locksmith would get the  
6 lead and we have nothing to do with it anymore.  
7 They own it. They just bought it for whatever the  
8 price, \$10 or whatever we agreed upon, and we pass  
9 it along.

10 **Q. And would you have electronic records of**  
11 **the lead being sold?**

12 A. For a certain amount of time. It depends  
13 what system we were using at the time. A while  
14 back, we used to use affiliate platforms like -- I  
15 forget what they -- I'd have to think of the name  
16 but where they trap all that stuff. Now we use  
17 Google Cloud for stuff now. We've switched  
18 throughout the years many times. So maybe on a new  
19 site possibly, but old sites, no. After years,  
20 especially if it's not being used, there's no more  
21 record of it unless there needs to be.

22 **Q. When did you start using Google Cloud?**

23 A. Google Cloud, we transitioned it would be  
24 like in December, I believe.

Page 43

1 **maintain?**

2 A. Correct.

3 **Q. And so that that platform would kind of**  
4 **store and maintain the records; is that accurate?**

5 A. I don't know how exactly it works. I know  
6 it does all the -- As far as aggregating, like  
7 sending it to people buying the leads, et cetera, I  
8 don't know how -- I had a programmer, you know, an  
9 engineer we usually paid to do all the back end  
10 work, and then Adam knows more about that side. I  
11 do the search, but usually we just hire someone to  
12 integrate the APIs. I don't know how that works.

13 **Q. Did you work with a particular engineer or**  
14 **were there multiple?**

15 A. Whoever we could find at the time who would  
16 give us a decent price.

17 **Q. Do you know who you were working with in**  
18 **2013?**

19 A. No. That was a long time ago.

20 **Q. And you mentioned APIs. Can you give me an**  
21 **idea of what that is?**

22 A. It's basically documents on how to set up  
23 posting instructions. The client usually provides  
24 that.

Page 42

1 **Q. December of 2019?**

2 A. Yes.

3 **Q. You mentioned affiliate platforms. Is that**  
4 **actually the name of it or you're talking about a**  
5 **couple of --**

6 A. I'm speaking generally. There's lots of  
7 companies out there who provide a service like we  
8 used to use. Like you can pay monthly anywhere from  
9 \$500 to \$1,000 where they do all the reporting and  
10 send the leads to the buyers, et cetera. Once you  
11 cancel, you lose all that data.

12 **Q. Do you recall the ones that you've used?**

13 A. I don't know. Adam would know better. I  
14 forget. I don't deal with that stuff much. I know  
15 about it, but it's not my specialty.

16 **Q. Can you recall any of the names of the ones**  
17 **you used?**

18 A. HitPath. I'm just looking it up. That's  
19 one.

20 **Q. HitPath?**

21 A. Yeah.

22 **Q. Do you recall any others?**

23 A. No.

24 **Q. That would require a monthly fee to**

Page 44

1 **Q. And by posting, do you mean after a lead is**  
2 **generated?**

3 A. You send in the lead, exactly.

4 **Q. Have you worked with particular types of**  
5 **APIs or are there multiple?**

6 A. Every company just sends over what they  
7 need, and then we just farm it out to someone who  
8 knows what they're doing to set it up. I don't know  
9 how to do that or read it. It's kind of more for an  
10 engineer. It's code.

11 **Q. When you say every company, do you mean the**  
12 **website's clients?**

13 A. Yeah. Who you're working with, they always  
14 provide some type of API or something to send it to  
15 them.

16 **Q. And for lead aggregation websites, just**  
17 **speaking generally, would you build that if you**  
18 **didn't have a client already in place?**

19 A. Possibly. We've done that just to see if  
20 we could get clients, but usually clients are in  
21 place. But sometimes we'll build sites just to see  
22 if we could find a market for it just before a trade  
23 show or something to show it off and see if we can  
24 get people to go out in the back end. There's



Page 45

1 always a way.

2 **Q. And do you recall if SnappyAuto had any**  
3 **clients in place at the time it was built?**

4 A. I don't know anything.

5 **Q. Would Adam Brown know that?**

6 A. I don't know. You'd have to ask him.

7 **Q. Who else besides Adam Brown had involvement**  
8 **in SnappyAuto.com?**

9 A. Based on what you said, I don't know. The  
10 only thing I see is his name in the stuff you're  
11 sending, so I have no clue. You'd have to ask him.

12 **Q. Getting back to Blueflame Web Marketing,**  
13 **when did you form Blueflame?**

14 A. I think in 2008.

15 **Q. Do you own any other companies?**

16 A. Not that are active, I don't think, no.

17 **Q. What about inactive?**

18 A. There might be some inactive ones that I've  
19 created throughout the years, but Blueflame is my  
20 main company.

21 **Q. Do you know the names of the companies you**  
22 **formed?**

23 A. No, because they're not even -- I mean they  
24 never really brought any revenue in, so they're not

Page 47

1 A. No. It was someone else.

2 **Q. Was Adam Brown associated with it?**

3 A. You'd have to ask him. I know he is more  
4 on the affiliate side, so he would know. I believe  
5 he was.

6 **Q. When you say more on the affiliate side,**  
7 **what do you mean?**

8 A. Like dealing with the companies like that.  
9 Like he -- I believe there was a company that did a  
10 spinoff on the site, but they're no longer in  
11 business.

12 **Q. You said a spinoff of a site?**

13 A. Like an affiliate member, but I just think  
14 the company who built Blueflame Elite is no longer  
15 in business.

16 **Q. Did Blueflame Elite have anything to do**  
17 **with SnappyAutoInsurance?**

18 A. Not that I know of. That was a long time.

19 **Q. I'm sorry?**

20 A. I haven't heard that name in years, so I  
21 don't know.

22 **Q. Can you give me a better sense of what**  
23 **Blueflame Elite did? I know you said it was an**  
24 **affiliate network, but what does that mean?**

Page 46

1 really relevant. The only one that matters is  
2 Blueflame.

3 **Q. Do you know if you registered the other**  
4 **companies?**

5 A. I mean you can look on my name and see  
6 what's out there, but I don't remember. This is the  
7 only active one that I know of.

8 **Q. Besides Blueflame, are you affiliated with**  
9 **any other companies?**

10 A. No.

11 **Q. Have you heard of Blueflame Elite?**

12 A. Blueflame Elite? I was an affiliate and I  
13 worked -- That was using one of those services years  
14 ago, but I think that was -- that was part of  
15 something that was sold off. Adam would know more  
16 about it, but, yeah, it was a spinoff.

17 **Q. So Blueflame only was a spinoff of**  
18 **Blueflame Web Marketing?**

19 A. No. It was like a similar name, but it was  
20 more of an affiliate -- it was an affiliate network.  
21 But another company started that. Adam would know  
22 more about it. It had the Blueflame name, but it  
23 wasn't my company.

24 **Q. Is it Adam Brown's company?**

Page 48

1 A. Basically just shows, you know, all these  
2 other companies that show offers that are paying  
3 \$10, \$12 a lead, if I put the leads in there at \$9 a  
4 lead and just try to find people to promote that and  
5 just make a couple of dollars off of it and send it  
6 to the people who are buying it for \$10 or \$11,  
7 basically a middle man affiliate network.

8 **Q. So not a lead generator but kind of the**  
9 **next step in the chain; is that accurate?**

10 A. Correct, yes. They kind of just added a  
11 few dollars to the cost of the lead and sold it to  
12 their clients. So they technically can do anything  
13 besides just transfer a lead.

14 **Q. All right. And do affiliates -- I think**  
15 **you said this before, but affiliates typically have**  
16 **contracts with a lead generator?**

17 A. I would assume so. We try to get a  
18 contract.

19 **Q. Besides Blueflame, have you been affiliated**  
20 **with any companies prior?**

21 A. Do I own them?

22 **Q. Let's start there. Have you owned any**  
23 **other companies?**

24 A. Like I said, a few that they're probably



<p style="text-align: right;">Page 49</p> <p>1 not -- Nothing significant. Affiliates, I've worked                  2 for a bunch of companies throughout my years.                  3 <b>Q. What about lead generation websites?</b>                  4 A. Yeah. I've worked for companies that all                  5 they do is lead generation. Not my own company.                  6 <b>Q. And you did that in your role as a</b>                  7 <b>consultant?</b>                  8 A. Or as an employee throughout the years                  9 before I started my own stuff.                  10 <b>Q. When is the last time you worked for</b>                  11 <b>another company?</b>                  12 A. Probably like March or April.                  13 <b>Q. Of this year?</b>                  14 A. Yeah. I was doing stuff in health                  15 insurance for a year or so, generating leads, but                  16 not for my company. I was getting paid to do it for                  17 someone else.                  18 <b>Q. And what company --</b>                  19 A. As an employee, not a -- Infinite Media.                  20 <b>Q. And how long had you worked for them?</b>                  21 A. I worked with them for about a year.                  22 <b>Q. Before that, had you worked for any other</b>                  23 <b>company like that?</b>                  24 A. Yeah. I mean -- Well, I worked for Advance</p>	<p style="text-align: right;">Page 51</p> <p>1 they sold the leads to, how many people they sold it                  2 to, what person they sold it to. That's a whole                  3 other department. I just get the traffic through                  4 the website. I don't deal with the back end stuff.                  5 I have an idea of how it works from being in the                  6 industry for a while, but I don't know the                  7 specifics. But that's not my -- I haven't done --                  8 That's not my specialty.                  9 <b>Q. You mentioned that you think you might have</b>                  10 <b>owned other companies but you don't recall the</b>                  11 <b>names; is that accurate?</b>                  12 A. I think like Search Sense Consulting was                  13 one of them. There might be one more, but it's                  14 stuff that I just built and then I just decided to                  15 stick with Blueflame. Like I was just trying to                  16 make the consulting a different company. I don't                  17 know. It was a very long time ago, but they're not                  18 even active, so I don't think it's relevant.                  19 <b>Q. Besides those two, have you ever been an</b>                  20 <b>officer of any other company?</b>                  21 A. Not that -- No, I don't think so.                  22 <b>Q. Has Blueflame ever had any employees?</b>                  23 A. Throughout the years, I believe maybe one.                  24 Like we've had people help out, yeah, on 1099. Not</p>
<p style="text-align: right;">Page 50</p> <p>1 America, but that's more of a -- they have 500                  2 locations, so that's a little bit different. But,                  3 yeah, I was running leads for them, but that was                  4 back probably in 2014, '15.                  5 <b>Q. And what do you mean by running leads?</b>                  6 A. I just ran a lot of traffic for their --                  7 for their affiliate folks.                  8 <b>Q. And besides those two companies, any</b>                  9 <b>others?</b>                  10 A. LeadFlash. That's where I started off.                  11 <b>Q. When was that?</b>                  12 A. 2005, 2008 probably.                  13 <b>Q. And was that similar that you were running</b>                  14 <b>leads, in your words?</b>                  15 A. Yeah, lead generation.                  16 <b>Q. So lead generation, that's different from</b>                  17 <b>generating traffic; is that accurate?</b>                  18 A. Traffic basically. We'd pay for ads on                  19 Google, generate a payday loan lead, and we'd sell                  20 it to one of 30 buyers in the back end.                  21 <b>Q. But I understand from your testimony you're</b>                  22 <b>more involved in the generating traffic side of</b>                  23 <b>things, correct?</b>                  24 A. I generate traffic for them as far as who</p>	<p style="text-align: right;">Page 52</p> <p>1 like physical like W-2 employees. Just 1099. Like                  2 more like consultants I brought on to help with                  3 stuff.                  4 <b>Q. How many would you estimate since 2008?</b>                  5 A. Like two.                  6 <b>Q. What are their names?</b>                  7 A. I'd have to look back. I mean it's been                  8 probably five, six, seven years since I've had                  9 someone, so --                  10 <b>Q. You don't recall their names?</b>                  11 A. Not off -- Honestly, no. I've done so many                  12 things since then. I'd have to look. It was just                  13 more people helping out.                  14 <b>Q. Do you recall what they helped with?</b>                  15 A. Just whatever I needed at the time. I'd                  16 have to look back.                  17 <b>Q. But can you give me a sense of what that</b>                  18 <b>would be generally?</b>                  19 A. Just help with paid search or e-mail                  20 marketing or just whatever I was doing at the time,                  21 just -- or sales it could have been. Probably                  22 sales, if I had to guess. That's usually what I                  23 needed most at the beginning is someone to get me                  24 more clients, like go find another locksmith or</p>

Page 53

1 plumber or companies for me to generate traffic for.  
2 **Q. And can you just give me a brief idea of**  
3 **how that works, how you find clients like that?**  
4 A. Well, I mean, 90 percent of our clients are  
5 all from referral, just word of mouth, but at the  
6 time starting out, just basically going into  
7 businesses and explaining how we could help them out  
8 and getting people to sign up just on a monthly  
9 retainer and generate traffic for them.  
10 **Q. And at any time since Blueflame was formed,**  
11 **has it had any additional officers besides you?**  
12 A. My ex-wife at one point. I think my  
13 ex-wife might have been on there at the beginning.  
14 **Q. And what's her name?**  
15 A. Ann.  
16 **Q. What's her last name?**  
17 A. Cohen. But she's not -- I mean she never  
18 really did anything. She was just on the company.  
19 **Q. Has Adam Brown ever worked for Blueflame?**  
20 A. Probably as a consultant at some point. I  
21 mean we paid him before for projects, but, like I  
22 said, that was probably years ago, you know, before  
23 he started his own companies.  
24 **Q. When did he start his own companies?**

Page 54

1 A. You'd have to ask him that. I'd say at  
2 least five to eight years ago.  
3 **Q. And what did you pay Adam Brown to do as a**  
4 **consultant?**  
5 A. Help with sales, I believe, at the time  
6 or -- Yeah, trying to help find affiliates to drive  
7 traffic to any sites that I owned at the time.  
8 **Q. And so at some point he decided to split**  
9 **off on his own?**  
10 A. Yeah, exactly.  
11 **Q. And you think that was somewhere between**  
12 **2012 and 2015?**  
13 A. Probably before that even. Probably around  
14 that. Maybe '12, somewhere around -- Honestly, he  
15 would know. I don't keep track.  
16 **Q. How long have you known him?**  
17 A. I've known him since like 2001 or 2000.  
18 **Q. Is it through the lead generation business**  
19 **or otherwise?**  
20 A. No. I know him from New York. We both  
21 grew up there.  
22 **Q. Is it fair to say that you work in the lead**  
23 **generation business?**  
24 A. Sure. I mean, yeah. That's part of the

Page 55

1 business.  
2 **Q. And how long have you been doing that**  
3 **approximately?**  
4 A. Since 2005.  
5 **Q. And who were you working with then?**  
6 A. I was working for LeadFlash.  
7 **Q. And did you leave LeadFlash to form**  
8 **Blueflame?**  
9 A. Correct.  
10 **Q. Have you ever worked with Seal Dog Media,**  
11 **LLC?**  
12 A. Yeah.  
13 **Q. And that's Adam Brown's company, correct?**  
14 A. Correct.  
15 **Q. What does that company do?**  
16 A. Affiliate. And I think they did a lot of  
17 data management.  
18 **Q. Can you give me a better idea what that**  
19 **means?**  
20 A. They have websites too and they provide  
21 traffic or we -- they give data from some of their  
22 sites to other partners. We'll give them data.  
23 Sometimes they'll buy data. It depends. I mean  
24 there's lots of companies like that.

Page 56

1 **Q. Do they run the lead aggregation websites?**  
2 A. I don't know how they get their traffic. I  
3 don't think he does it through search. I don't know  
4 how he gets them. You'd have to ask him.  
5 **Q. And when have you worked with Seal Dog?**  
6 A. I work with them all the time.  
7 **Q. So you work with them currently?**  
8 A. Yeah.  
9 **Q. What's the first -- What do you do for them**  
10 **or with them?**  
11 A. We basically just -- Sometimes I'll buy  
12 data from them or I'll sell them data from some of  
13 our partners.  
14 **Q. Does Seal Dog run any websites?**  
15 A. I don't know if they run them direct or if  
16 they're like -- they're the -- I guess they speak  
17 for the website. I can't think of the word I'm  
18 trying to use. Usually they are assigned to a site.  
19 I don't know. You'd have to ask Adam.  
20 **Q. Are you aware of any websites they're**  
21 **affiliated with one way or another?**  
22 A. I mean they have a lot of websites they're  
23 affiliated with. You'd have to ask him.  
24 **Q. Have you heard of a website called**

<p style="text-align: right;">Page 57</p> <p>1 <b>SnappySurveys.net?</b>                  2 A. Sounds familiar.                  3 <b>Q. Do you know anything about that website?</b>                  4 A. I'll look at it now. Yeah, I've heard of                  5 the site.                  6 <b>Q. Do you know who runs it?</b>                  7 A. It looks like it says contacts at                  8 Offervision which was Adam's old company, so it                  9 could be one of the sites he sold off.                  10 <b>Q. So Offervision, is that one word or two?</b>                  11 A. I believe it's one word.                  12 <b>Q. And was Adam the sole owner of that?</b>                  13 A. I don't know. I think so. I'm not sure.                  14 <b>Q. Did you ever work with or for Offervision?</b>                  15 A. I worked with them as a partner but not for                  16 them. I mean I didn't have any ownership in it, so                  17 I don't know. He sold that company on his own,                  18 so --                  19 <b>Q. Do you remember any specific work that you</b>                  20 <b>did with them as a partner?</b>                  21 A. Affiliate really. Same stuff. Data                  22 management, I'm sure.                  23 <b>Q. But I think you also mentioned that</b>                  24 <b>Offervision ran some lead aggregation websites; is</b></p>	<p style="text-align: right;">Page 59</p> <p>1 A. No. It wasn't my sale.                  2 <b>Q. So you didn't make any money from that?</b>                  3 A. No. I would have liked to, but I didn't.                  4 <b>Q. Where do you currently reside?</b>                  5 A. Boca Raton, Florida.                  6 <b>Q. And what's your address?</b>                  7 A. 19748 Dinner Key Drive.                  8 <b>Q. Do you own that?</b>                  9 A. Yes.                  10 <b>Q. And who lives with you currently?</b>                  11 A. My wife, my kids.                  12 <b>Q. And what's your wife's name?</b>                  13 A. Dana.                  14 <b>Q. Same last name?</b>                  15 A. No. De la Madrid.                  16 <b>Q. How long have you lived there?</b>                  17 A. Four years.                  18 <b>Q. 2016?</b>                  19 A. Yeah, somewhere around there.                  20 <b>Q. Where did you live prior to that?</b>                  21 A. In Boca also. I forget the address. I was                  22 renting after I sold my last house for like a year.                  23 <b>Q. And what's the last house that you owned</b>                  24 <b>prior to your current one?</b></p>
<p style="text-align: right;">Page 58</p> <p>1 <b>that right?</b>                  2 A. I think so back in the day.                  3 <b>Q. And you think Snappy was one of those</b>                  4 <b>websites?</b>                  5 A. Oh, I don't know. I don't know.                  6 SnappySurveys, yeah, I think so because it just says                  7 one thing about us. It says Offervision, so I don't                  8 know. The auto one, I don't know.                  9 <b>Q. Do you know who formed Offervision?</b>                  10 A. No clue.                  11 <b>Q. Would he have been running a website that</b>                  12 <b>wasn't owned by Offervision?</b>                  13 A. That's him.                  14 <b>Q. I think you testified earlier that you</b>                  15 <b>believe Snappy was sold when Offervision was sold;</b>                  16 <b>is that an accurate description of your testimony?</b>                  17 A. Yeah, I believe so, because the other                  18 Snappys like that one are Offervision sites, so I'm                  19 assuming that's what was sold off. Last time I                  20 talked to Adam, he said he thinks it was sold off                  21 and he was going to look. I don't know. You'd have                  22 to ask him.                  23 <b>Q. Do you know anything else about the sale of</b>                  24 <b>Offervision?</b></p>	<p style="text-align: right;">Page 60</p> <p>1 A. 21766 Little Bear Court, Boca 33428.                  2 <b>Q. And did you live there when you owned it?</b>                  3 A. Partly, yeah. I rented it out for a while                  4 also.                  5 <b>Q. When did you buy that house?</b>                  6 A. I don't know. 2007 maybe. I don't                  7 remember. Or maybe 2006. I don't know.                  8 <b>Q. Were you the sole owner?</b>                  9 A. Me and my ex-wife.                  10 <b>Q. That would have been Ann Cohen?</b>                  11 A. Yes.                  12 <b>Q. And when did you sell it?</b>                  13 A. 2015 or '16.                  14 <b>Q. And which of the years were you living</b>                  15 <b>there?</b>                  16 A. I lived there like two years, I guess,                  17 prior to selling it, so --                  18 <b>Q. Approximately 2014 to 2016 you were living</b>                  19 <b>at the address?</b>                  20 A. Yeah. Maybe a little longer. Like maybe I                  21 lived there a year or two before that. I'd have to                  22 look. I lived there, and then I moved to South                  23 Carolina for a little bit, and then I moved back.                  24 <b>Q. When you were living there, did anyone else</b></p>

<p style="text-align: right;">Page 61</p> <p><b>1 live with you?</b></p> <p>2 A. Yeah, just my wife and kids, my ex-wife.</p> <p><b>3 Q. And before you were living there, you said</b></p> <p><b>4 you rented it?</b></p> <p>5 A. I rented it, yeah.</p> <p><b>6 Q. And who did you rent it to?</b></p> <p>7 A. I had -- Well, Adam and his wife were</p> <p>8 renting there a little bit before they bought a</p> <p>9 house, and then I just had another just random</p> <p>10 tenant that I found.</p> <p><b>11 Q. Do you know the years that Adam was living</b></p> <p><b>12 there?</b></p> <p>13 A. I have no clue. You'd have to ask him.</p> <p><b>14 Q. But safe to say it was after you purchased</b></p> <p><b>15 and before the time that you moved in to live there;</b></p> <p><b>16 is that accurate?</b></p> <p>17 A. When I first bought the house in 2006 or</p> <p>18 '5, whatever it was, I lived there for a while and</p> <p>19 then moved out of state for a little bit, rented it</p> <p>20 out to someone else, and then Adam rented it. And</p> <p>21 then I moved back in to fix it up and sell it and I</p> <p>22 ended up staying there for a little while.</p> <p><b>23 Q. How long did he live there?</b></p> <p>24 A. Probably like a year. Not too long because</p>	<p style="text-align: right;">Page 63</p> <p><b>1 services?</b></p> <p>2 A. I mean he's paid me for like if I sell him</p> <p>3 data or something, not for service. But, yeah, I</p> <p>4 mean I guess. We buy stuff off of each other that</p> <p>5 we need.</p> <p><b>6 Q. I think you mentioned you were also a</b></p> <p><b>7 consultant at one point for I think you said</b></p> <p><b>8 Offervision, is that correct, or it might have been</b></p> <p><b>9 Seal Dog?</b></p> <p>10 A. Not a consultant for either one of them. I</p> <p>11 said we do business with both of those.</p> <p><b>12 Q. And when you say do business, what do you</b></p> <p><b>13 mean?</b></p> <p>14 A. Like the same way all these other -- If he</p> <p>15 needs some type of data, I can find it for him. Or</p> <p>16 if I need it, I'll buy it from him, et cetera, if he</p> <p>17 has a client that has something I'm looking for and</p> <p>18 vice versa.</p> <p><b>19 Q. Do you recall if you made any money off of</b></p> <p><b>20 SnappyAutoInsurance.com?</b></p> <p>21 A. No, I don't think so. It was a failed</p> <p>22 site.</p> <p><b>23 Q. When you say -- I just want to make sure</b></p> <p><b>24 I'm understanding your testimony. When you say that</b></p>
<p style="text-align: right;">Page 62</p> <p>1 I wanted to move back in.</p> <p><b>2 Q. Do you know if he was running any</b></p> <p><b>3 businesses when he lived there?</b></p> <p>4 A. I don't know. You'd have to ask him. I</p> <p>5 think he was working for a company at the time, so</p> <p>6 I'm not sure.</p> <p><b>7 Q. When did you first start working with Adam</b></p> <p><b>8 Brown?</b></p> <p>9 A. We've been friends, like I said, since</p> <p>10 2000, so we always just tried to think of ideas</p> <p>11 together, but on and off for -- since I've known him</p> <p>12 trying to always do something.</p> <p><b>13 Q. So in addition to a friend, I mean is it</b></p> <p><b>14 fair to describe him as a business partner?</b></p> <p>15 A. No. I'd say he's a friend, slash, like I</p> <p>16 guess we just try to be successful so we bounce</p> <p>17 ideas off of each other, but we run separate</p> <p>18 businesses. Try not to mix friends and business too</p> <p>19 much.</p> <p><b>20 Q. Has he ever run or been affiliated with a</b></p> <p><b>21 business in connection with which you were paid?</b></p> <p>22 A. We run --</p> <p><b>23 Q. Let me rephrase that. Has Adam Brown or</b></p> <p><b>24 any of his companies ever paid you for professional</b></p>	<p style="text-align: right;">Page 64</p> <p><b>1 it was a failed site, again, you're speaking from</b></p> <p><b>2 memory; is that correct?</b></p> <p>3 A. Yeah, just from memory. I'm just guessing,</p> <p>4 because if it made money, I'd remember it.</p> <p><b>5 Q. Do you know if Adam Brown ever made money</b></p> <p><b>6 off of it?</b></p> <p>7 A. I don't know. You'd have to ask him.</p> <p><b>8 Q. What about Blueflame?</b></p> <p>9 MR. BRODERICK: Objection.</p> <p>10 A. What about Blueflame?</p> <p><b>11 Q. Did Blueflame ever make money off of</b></p> <p><b>12 SnappyAutoInsurance.com?</b></p> <p>13 MR. BRODERICK: Objection.</p> <p>14 A. No.</p> <p><b>15 Q. Have you ever heard of the address 9691</b></p> <p><b>16 Arbor Oaks, Unit 302, Boca Raton?</b></p> <p>17 A. I don't know. It's not my address. I</p> <p>18 don't know.</p> <p><b>19 Q. Have you heard of it?</b></p> <p>20 A. I mean Arbor Oaks sounds familiar. I think</p> <p>21 it's a neighborhood around here, but I've never</p> <p>22 lived there.</p> <p><b>23 Q. Do you know anyone who lived there?</b></p> <p>24 A. I don't know.</p>

Page 65

1 Q. You don't know -- What do you mean by you  
2 don't know?  
3 A. Is it a house or is it an apartment? I  
4 don't know.  
5 Q. I'm just asking you if you know anyone  
6 who's lived there.  
7 A. It sounds familiar, but I don't know. I  
8 mean is it something recent or -- I don't know how  
9 it's associated. I'm trying to think. It sounds  
10 like a familiar neighborhood. I just don't know who  
11 would live there. I've lived here since 2000 or  
12 2001. I used to live with Adam in college in an  
13 apartment, so I don't know. Is it one of our old  
14 apartment addresses? I don't know how old that is.  
15 Q. I want to talk about  
16 SnappyAutoInsurance.com for a few minutes. I think  
17 your testimony is that you don't have a specific  
18 memory of being involved with this website; is that  
19 accurate?  
20 A. Correct.  
21 Q. Does the website kind of ring a bell to  
22 you?  
23 A. Like I said, the Snappy name does, but  
24 there's a lot of sites. Like there's SnappySurvey.

Page 66

1 There's a million different Snappy versions out  
2 there. So it rings a bell as far as the name  
3 Snappy, but that site particularly, no, I don't  
4 recall running it or being -- you know, making money  
5 off of that site. I've never seen anything come in  
6 from SnappyAutoInsurance nor have I seen that site  
7 in years or nor is it in any of my systems.  
8 Q. I think you mentioned your Google search  
9 account. What other systems do you have that you'd  
10 be able to see?  
11 A. Cloud Servers just has all our data that we  
12 transfer. And, besides that, that's really --  
13 everything is just kept in the Cloud.  
14 Q. You mentioned "we." Who are you referring  
15 to?  
16 A. Well, I said me. I'm used to saying we  
17 when I talk about Blueflame, but --  
18 Q. That term "Snappy," was that Adam Brown's  
19 creation?  
20 A. Probably. It wasn't mine.  
21 Q. Are you aware of anyone else involved?  
22 A. No.  
23 Q. And we talked about SnappySurveys.net; do  
24 you recall that?

Page 67

1 A. Yes. It sounds like a familiar site.  
2 Q. Do you remember any other Snappy websites?  
3 A. Not offhand, but I know there's a few.  
4 Q. And, to your knowledge, those would have  
5 been owned by Offervision?  
6 A. Correct. Well, at least that one I see was  
7 because it shows up when you contact us.  
8 Q. Do you know where Adam ran Offervision out  
9 of?  
10 A. No. You'd have to ask him. I believe he  
11 had an office.  
12 Q. Did he run that by himself?  
13 A. You'd have to ask him.  
14 Q. To your knowledge --  
15 A. We've shared offices before in the past.  
16 We kind of just shared space so we could be out of  
17 our houses, but, you know, we run separate  
18 companies. I don't really ask him about that stuff.  
19 Q. When did you share office space?  
20 A. Probably 2015 maybe.  
21 Q. What was the address?  
22 A. It was just a shared -- Something on State  
23 Road. One of those spaces you could just share  
24 office space.

Page 68

1 Q. This is within Boca Raton?  
2 A. Yeah.  
3 Q. And I think you said State Road?  
4 A. Yeah. I don't -- Now it's called like  
5 Nexus. I don't know what it used to be called.  
6 It's changed owners a few times since then. I see  
7 it when I drive by it's called Nexus now. I don't  
8 know what it was called before.  
9 Q. Do you know a street address?  
10 A. It's just a shared, you know, office  
11 building like where you could just rent space  
12 monthly. It wasn't like an actual office.  
13 Q. Do you know the street?  
14 A. It's off State Road 7. That's all I know.  
15 Q. At any point, did you ever have access to  
16 SnappyAutoInsurance.com?  
17 A. No.  
18 Q. Do you know who did have access?  
19 A. No.  
20 Q. Do you know who owned the website?  
21 A. No. Just based off what you sent me.  
22 Q. Do you know who paid for it?  
23 A. No clue.  
24 Q. Do you know who operated that?



<p style="text-align: right;">Page 69</p> <p>1 A. Nope.</p> <p>2 <b>Q. Is webmaster a term that's used for lead</b></p> <p>3 <b>aggregation websites? Have you ever heard that</b></p> <p>4 <b>term?</b></p> <p>5 A. I think it's used for registers when you</p> <p>6 buy a domain name.</p> <p>7 <b>Q. What do you mean?</b></p> <p>8 A. When you -- Like when you register a domain</p> <p>9 name, I think it's like -- it says webmaster or</p> <p>10 whatever on there. I don't know. It shows it under</p> <p>11 a private -- If you look up the loans that -- I</p> <p>12 don't know. I think it's just through the register,</p> <p>13 wherever you register the domain from. Most people</p> <p>14 do it private.</p> <p>15 <b>Q. So have you heard that term being used in</b></p> <p>16 <b>this context?</b></p> <p>17 A. Webmaster, yeah, if I'm looking up on the</p> <p>18 website. Most of the time they're private, so you</p> <p>19 couldn't tell who owns it.</p> <p>20 <b>Q. And typically you have to pay extra to have</b></p> <p>21 <b>that information private; is that correct?</b></p> <p>22 A. A lot of services give it free now, but you</p> <p>23 used to. Most of the companies I used to register</p> <p>24 domains, they came free, just part of the service.</p>	<p style="text-align: right;">Page 71</p> <p>1 <b>Q. So is it fair to say all lead aggregation</b></p> <p>2 <b>websites are domain names?</b></p> <p>3 A. Yes, I would say so. I'd say the majority.</p> <p>4 I don't know how everyone -- If I knew how everyone</p> <p>5 generated leads, I'd be very rich.</p> <p>6 <b>Q. And so I think you testified that you're</b></p> <p>7 <b>not sure who runs SnappyAutoInsurance.com; is that</b></p> <p>8 <b>correct?</b></p> <p>9 A. Yup.</p> <p>10 <b>Q. What about at any point from 2013 to</b></p> <p>11 <b>present?</b></p> <p>12 A. Have no clue.</p> <p>13 <b>Q. Do you have any knowledge or memory about</b></p> <p>14 <b>how leads were generated or sold from that website?</b></p> <p>15 A. No.</p> <p>16 <b>Q. And does that include from 2013 to present?</b></p> <p>17 A. Correct.</p> <p>18 <b>Q. Do you know when the website was last used?</b></p> <p>19 A. I don't know.</p> <p>20 <b>Q. Would it surprise you if I told you that it</b></p> <p>21 <b>was used as recently as of July of this year?</b></p> <p>22 MR. BRODERICK: Objection.</p> <p>23 A. Nothing would surprise me. It's not my</p> <p>24 site, so I don't know.</p>
<p style="text-align: right;">Page 70</p> <p>1 <b>Q. What are the websites you've used to create</b></p> <p>2 <b>domains?</b></p> <p>3 A. Namecheap, GoDaddy, just whatever is the</p> <p>4 cheapest at the time.</p> <p>5 <b>Q. And when you do that, do you use your</b></p> <p>6 <b>personal name or do you use Blueflame's?</b></p> <p>7 A. I don't know what's in there. It's auto</p> <p>8 fields. Probably Blueflame.</p> <p>9 <b>Q. Do you know when SnappyAutoInsurance.com</b></p> <p>10 <b>was registered, the domain name?</b></p> <p>11 A. I mean per your exhibit, it looks like</p> <p>12 2013. I don't know.</p> <p>13 <b>Q. Do you have any personal knowledge?</b></p> <p>14 A. No. Just only from what you sent me.</p> <p>15 <b>Q. And you know it's a domain name, correct?</b></p> <p>16 A. Correct.</p> <p>17 <b>Q. And do you know that from what I sent you</b></p> <p>18 <b>or do you have a memory or personal knowledge of</b></p> <p>19 <b>that?</b></p> <p>20 A. No. From what you sent me, I see that it</p> <p>21 shows it was 2017.</p> <p>22 <b>Q. Well, I'm just talking about the fact that</b></p> <p>23 <b>it's a domain name.</b></p> <p>24 A. Oh, yeah, obviously. I know that.</p>	<p style="text-align: right;">Page 72</p> <p>1 <b>Q. Have you ever seen any documents associated</b></p> <p>2 <b>with that website?</b></p> <p>3 A. Just from what you guys sent me.</p> <p>4 <b>Q. Other than what I sent you, have you seen</b></p> <p>5 <b>any other documents?</b></p> <p>6 MR. BRODERICK: Objection.</p> <p>7 A. Well, I mean other than what, I guess,</p> <p>8 anyone involved in this case sent me. I don't know</p> <p>9 who sent me what. I just looked at it, but -- I</p> <p>10 don't look at the names. That's it.</p> <p>11 <b>Q. Are you aware of whether the website was</b></p> <p>12 <b>taken down?</b></p> <p>13 A. I don't know. It's not my website.</p> <p>14 <b>Q. Notwithstanding that, you're saying it's</b></p> <p>15 <b>not your website, do you have any knowledge about</b></p> <p>16 <b>the website being taken down?</b></p> <p>17 A. I don't know. I don't have a way to take</p> <p>18 it down. I don't have control of that site, so --</p> <p>19 <b>Q. I'm asking kind of a simpler question which</b></p> <p>20 <b>is, notwithstanding whether you had any involvement</b></p> <p>21 <b>in it, are you aware or do you have any knowledge of</b></p> <p>22 <b>the website being taken down?</b></p> <p>23 A. No.</p> <p>24 <b>Q. Have you tried to visit the website?</b></p>

<p style="text-align: right;">Page 73</p> <p>1 A. Yes, when I was sent all this information                  2 from you guys.                  3 <b>Q. Prior to that time, when is the last time</b>                  4 <b>you visited the website?</b>                  5 A. Couldn't even tell you. Probably when -- I                  6 don't even know. I don't even know if I ever did.                  7 Maybe at the beginning when it was first created,                  8 but I don't know. No time in the recent few years                  9 besides checking once you guys reached out, and the                  10 site's not even up.                  11 <b>Q. When you say the site's not up, you're</b>                  12 <b>talking about when you visited it recently; is</b>                  13 <b>that --</b>                  14 A. Yes, that domain, at least for me.                  15 <b>Q. What approximate date did you last visit</b>                  16 <b>it?</b>                  17 A. Probably whenever one of your mailings                  18 were -- I don't know. I haven't visited in the past                  19 month or so. I don't know when it was -- the chain                  20 started.                  21 <b>Q. And in reviewing the documents that we sent</b>                  22 <b>over, did you become aware that either you or</b>                  23 <b>Blueflame had some involvement in this website?</b>                  24 A. No. I just saw my name on the site, but</p>	<p style="text-align: right;">Page 75</p> <p>1 A. I'm fine. I'm trying to respond. One                  2 second.                  3 MS. KINGSTON: Actually, this is a                  4 good time. Let's just take a five-minute break.                  5 (Recess taken.)                  6 <b>Q. Let's get back on the record. So I'm going</b>                  7 <b>to mark what's been pre-marked as Exhibits 1 through</b>                  8 <b>16. I'm going to mark all 16 exhibits at this time.</b>                  9 <b>And I'm going to show you, Mr. Cohen, what's been</b>                  10 <b>marked as Exhibit 3 which I sent you a copy of, but</b>                  11 <b>I'm going to screen share. Do you see that on your</b>                  12 <b>screen?</b>                  13 A. Yes.                  14 <b>Q. This is Exhibit 3. This is a screen shot</b>                  15 <b>that was taken from the WaybackMachine.com from --</b>                  16 <b>for SnappyAutoInsurance.com as of September 6, 2019.</b>                  17 <b>Do you recognize this page?</b>                  18 A. No.                  19 <b>Q. Did you build this website?</b>                  20 A. No.                  21 <b>Q. Do you have any knowledge of who built the</b>                  22 <b>website?</b>                  23 A. No.                  24 <b>Q. Do you see this telephone number towards</b></p>
<p style="text-align: right;">Page 74</p> <p>1 that's common. I've seen my name on sites I don't                  2 even know. Some people take a site that does good                  3 overseas, clone it, and take all the information and                  4 run a site. It happens all the time. I'm not                  5 saying that's what happened here.                  6 Yeah, I see my name on it, but I don't see                  7 anything bad. I'm just in a privacy policy, so                  8 it's -- I could have -- It could have been pulled                  9 off another site that I was involved with and they                  10 took a privacy policy or I could have done something                  11 with this site and it just never worked, but I don't                  12 have any record of this site.                  13 <b>Q. And do you have any memory of this site at</b>                  14 <b>all?</b>                  15 A. No. Like I said, maybe I remember trying                  16 to collab. with Adam at the beginning and it just                  17 didn't work out, but I don't know anything besides                  18 that.                  19 <b>Q. Did Adam Brown talk to you about taking the</b>                  20 <b>website down?</b>                  21 A. No.                  22 <b>Q. Okay. I'm going to screen share a couple</b>                  23 <b>of exhibits. Are you doing okay or do you want a</b>                  24 <b>quick break?</b></p>	<p style="text-align: right;">Page 76</p> <p>1 <b>the end of the page?</b>                  2 A. It's too small.                  3 <b>Q. Can you see it better now?</b>                  4 A. No.                  5 <b>Q. Is that better?</b>                  6 A. There's just thumbnails, but, either way, I                  7 don't know the phone number.                  8 MS. KINGSTON: Ted, is that coming out                  9 clearly for you?                  10 MR. BRODERICK: You don't have it                  11 open. It's just the thumbnails of all the exhibits.                  12 <b>Q. So you can't see this page?</b>                  13 MR. BRODERICK: Double click that.                  14 <b>Q. I did. Let me try again. What about now?</b>                  15 MR. BRODERICK: There you go.                  16 <b>Q. Let's start over. So, Mr. Cohen, do you</b>                  17 <b>recognize this page, this screen shot?</b>                  18 A. No. It just looks like a regular auto                  19 insurance form.                  20 <b>Q. Okay.</b>                  21 A. It looks like it's an iframe of someone                  22 else's site.                  23 <b>Q. What do you mean by iframe?</b>                  24 A. Like it's just someone else's lead form in</p>

<p style="text-align: right;">Page 77</p> <p>1 the middle there of different companies.</p> <p>2 <b>Q. So we're looking at the lead form of the</b></p> <p>3 <b>web page?</b></p> <p>4 A. Correct.</p> <p>5 <b>Q. And your testimony is that you did not</b></p> <p>6 <b>build this website?</b></p> <p>7 A. No.</p> <p>8 <b>Q. Did you have any involvement in building</b></p> <p>9 <b>the website?</b></p> <p>10 A. No. I mean not that I know of. I</p> <p>11 shouldn't say no, but not that I remember.</p> <p>12 <b>Q. Is this in the same form that you would</b></p> <p>13 <b>build websites?</b></p> <p>14 A. It's pretty basic, so I don't know. It</p> <p>15 doesn't really show much.</p> <p>16 <b>Q. Do you have any knowledge of who built this</b></p> <p>17 <b>website?</b></p> <p>18 A. It looks like it's -- No. No, I don't.</p> <p>19 <b>Q. Do you see this number towards the end of</b></p> <p>20 <b>the page?</b></p> <p>21 A. No clue. It's probably someone buying</p> <p>22 leads, if I had to guess. I don't know what</p> <p>23 happens, what you call it.</p> <p>24 <b>Q. So you don't recognize that number?</b></p>	<p style="text-align: right;">Page 79</p> <p>1 <b>Exhibit 5. Can you see that?</b></p> <p>2 A. Yup.</p> <p>3 <b>Q. Exhibit 5 is a screen shot from Wayback</b></p> <p>4 <b>Machine for SnappyAutoInsurance.com from August 16,</b></p> <p>5 <b>2018. And this is the privacy policy. Have you</b></p> <p>6 <b>ever seen this before?</b></p> <p>7 A. Nope.</p> <p>8 <b>Q. Did you create this?</b></p> <p>9 A. No.</p> <p>10 <b>Q. I'm scrolling down to the portion that</b></p> <p>11 <b>says, "Use of information." Do you see that?</b></p> <p>12 A. Yes. I see Blueflame there, but I don't</p> <p>13 know. I didn't create this.</p> <p>14 <b>Q. So there's quite a few references to</b></p> <p>15 <b>Blueflame here, correct?</b></p> <p>16 A. Yeah. It looks like it. Maybe if you find</p> <p>17 some old site of mine, probably just copied and</p> <p>18 pasted off of it and they forgot to change the name.</p> <p>19 <b>Q. So you think some other company or person</b></p> <p>20 <b>copied a website --</b></p> <p>21 A. Probably used the privacy policy on a</p> <p>22 related site and just forgot to do find and replace.</p> <p>23 It probably should have said old</p> <p>24 SnappyAutoInsurance. Most sites don't say the</p>
<p style="text-align: right;">Page 78</p> <p>1 A. No. I don't have any 888 numbers. I'm</p> <p>2 going to guess it's probably someone buying leads,</p> <p>3 though.</p> <p>4 <b>Q. I'm going to show you what's been marked as</b></p> <p>5 <b>Exhibit 4. Do you see that?</b></p> <p>6 A. Yes.</p> <p>7 <b>Q. So Exhibit 4 is a screen shot from Wayback</b></p> <p>8 <b>Machine for SnappyAutoInsurance from -- this one's</b></p> <p>9 <b>from August 16, 2018, and we're looking at the terms</b></p> <p>10 <b>of use. Have you ever seen this before?</b></p> <p>11 MR. BRODERICK: Objection.</p> <p>12 A. Not terms of use. I mean I've seen terms</p> <p>13 of use on a million sites.</p> <p>14 <b>Q. The specific terms of use for</b></p> <p>15 <b>SnappyAutoInsurance.com.</b></p> <p>16 A. No. I don't know. I didn't put it there.</p> <p>17 <b>Q. So you didn't create this?</b></p> <p>18 A. No.</p> <p>19 <b>Q. Do you know who did?</b></p> <p>20 A. I have no clue.</p> <p>21 <b>Q. Your testimony is you have no knowledge who</b></p> <p>22 <b>created this terms of use?</b></p> <p>23 A. No.</p> <p>24 <b>Q. I'm going to show you what's been marked as</b></p>	<p style="text-align: right;">Page 80</p> <p>1 company name on them because they would just go</p> <p>2 directly to the company.</p> <p>3 <b>Q. So you have no knowledge of how Blueflame's</b></p> <p>4 <b>name ended up on the privacy policy for</b></p> <p>5 <b>SnappyAutoInsurance.com; is that your testimony?</b></p> <p>6 A. Yes.</p> <p>7 <b>Q. Do you know if Adam Brown put it there?</b></p> <p>8 A. I have no clue. It seems like it was a</p> <p>9 mistake.</p> <p>10 <b>Q. Why do you say that?</b></p> <p>11 A. Because most companies would put the name</p> <p>12 of the website, not a company name, because then if</p> <p>13 you're running a lead aggregation site or an</p> <p>14 affiliate site, if they see where it's coming from,</p> <p>15 then they would just go direct to them and cut out</p> <p>16 the middle man, so it wouldn't be a smart move.</p> <p>17 <b>Q. Going down to access to information, it</b></p> <p>18 <b>references an address 9691 Arbor Oaks, Unit 302,</b></p> <p>19 <b>Boca Raton, Florida. Do you see that?</b></p> <p>20 A. Yes. I've never lived there.</p> <p>21 <b>Q. Do you know anyone who has lived there?</b></p> <p>22 A. No, not that I know of.</p> <p>23 <b>Q. Do you know if Adam Brown's ever lived</b></p> <p>24 <b>there?</b></p>

<p style="text-align: right;">Page 81</p> <p>1 A. He might have. I don't know. I don't                  2 recall the address. The neighborhood sounds                  3 familiar, like I said, but I don't know all of his                  4 addresses, especially way back then. I don't keep                  5 track of where he lives.                  6 <b>Q. I'm asking more generally, not about</b>                  7 <b>SnappyAutoInsurance. When you've built sites in the</b>                  8 <b>past, have you created the privacy policies?</b>                  9 A. Or they're provided or I take them -- like                  10 I said, I'll take them from one of my other sites                  11 that deal with the same partners and find and                  12 replace the name. That's why I'm saying something                  13 like this could have been done wrong or I don't know                  14 how they do it. It's not my site.                  15 <b>Q. Does this look like the same form that you</b>                  16 <b>use?</b>                  17 A. I don't know. I had a lawyer years ago and                  18 I don't read through it. Only when someone needs me                  19 to change something. I couldn't even tell you.                  20 <b>Q. Does this style look familiar to you?</b>                  21 A. It looks like a standard privacy policy                  22 that most sites use, yes.                  23 <b>Q. Do you know if you've ever used this form</b>                  24 <b>for another website?</b></p>	<p style="text-align: right;">Page 83</p> <p>1 <b>Q. What about now?</b>                  2 A. Yes.                  3 <b>Q. So, like I said, this is Exhibit 7. This</b>                  4 <b>is the subpoena response from Mailgun Technologies,</b>                  5 <b>Inc. in response to a request for information about</b>                  6 <b>the owner of SnappyAutoInsurance.com. Do you see</b>                  7 <b>that your name is listed here?</b>                  8 A. I do, and my address and my credit card,                  9 but I don't know -- but what's Mailgun?                  10 <b>Q. So you have never heard of the company</b>                  11 <b>Mailgun Technologies, Inc.?</b>                  12 A. Obviously I bought something for a very                  13 little amount, \$10, so I don't even know what it                  14 could be. But are they -- And how is this related                  15 to that site? What did I buy or what is this -- I                  16 guess what does Mailgun even do? I've never heard                  17 of them. Maybe they're under a different name,                  18 that's their company name and -- Do they operate                  19 under a different name?                  20 <b>Q. I'm just going to ask you the questions.</b>                  21 <b>If you can try to focus on the questions that I'm</b>                  22 <b>asking. They listed an American Express ending in</b>                  23 <b>1003. Do you see that?</b>                  24 A. Yes.</p>
<p style="text-align: right;">Page 82</p> <p>1 A. I have no clue. I literally haven't read                  2 through a full privacy policy in years. I pay                  3 people to do that.                  4 <b>Q. I'm going to show you what's been marked as</b>                  5 <b>Exhibit 6. This is a subpoena that was issued from</b>                  6 <b>the plaintiffs' attorney to a company called Mailgun</b>                  7 <b>Technologies, Inc.</b>                  8 A. I don't know who that is.                  9 <b>Q. You've never heard of a company called</b>                  10 <b>Mailgun Technologies?</b>                  11 A. Mailgun Technologies, no.                  12 <b>Q. So looking at the subpoena, it's requesting</b>                  13 <b>documents relating to the owner of the website</b>                  14 <b>SnappyAutoInsurance.com. This includes but is not</b>                  15 <b>limited to the name and contact information for the</b>                  16 <b>registrant as well as billing and invoice</b>                  17 <b>information. Do you see that?</b>                  18 A. Yes.                  19 <b>Q. So now I'm going to show you what's been</b>                  20 <b>marked as Exhibit 7. And this is the subpoena</b>                  21 <b>response from Mailgun Technologies. Can you see</b>                  22 <b>that now? Is there an Excel spreadsheet showing for</b>                  23 <b>you?</b>                  24 A. No. It just shows the district court.</p>	<p style="text-align: right;">Page 84</p> <p>1 <b>Q. Is that your credit card?</b>                  2 A. I don't know. I mean I have a ton of                  3 different American Express cards, so I don't know.                  4 <b>Q. So you're not sure if that's your card?</b>                  5 A. I don't know. I mean I don't know -- The                  6 numbers, I'm sure, have changed since then, but --                  7 <b>Q. What about that e-mail,</b>                  8 <b>BlueflameWeb@gmail.com; is that your e-mail address?</b>                  9 A. Yes, that's my e-mail address.                  10 <b>Q. What about the phone number?</b>                  11 A. Where does it have a phone number?                  12 <b>Q. So in line four, column B, 561-573-9083; is</b>                  13 <b>that your phone number?</b>                  14 A. Yes.                  15 <b>Q. Is that your cell phone?</b>                  16 A. Yes.                  17 <b>Q. Do you see the address listed?</b>                  18 A. That's my address.                  19 <b>Q. Do you recall paying for service through</b>                  20 <b>Mailgun Technologies, Inc.?</b>                  21 A. I'm looking right now. You have a new                  22 invoice, zero dollars, zero dollars, including                  23 messages. I don't know. It doesn't say -- When I                  24 type Mailgun and that e-mail address, there's a ton</p>

<p style="text-align: right;">Page 85</p> <p>1 of stuff coming up. I don't know what the hell they                  2 are.                  3 <b>Q. And you're talking about</b>                  4 <b>BlueflameLab@gmail.com?</b>                  5 A. Yes. I see it for 2017, 2018. It says my                  6 card expired and they stopped billing me, but I                  7 don't even know what the hell it is.                  8 <b>Q. Does it mention --</b>                  9 A. Amount paid, \$5 in 2017. I don't even know                  10 what -- I'd have to look up Mailgun. I don't even                  11 know what the hell it is.                  12 <b>Q. Can you provide us copies of those e-mails?</b>                  13 A. Yeah. It looks like an e-mail service. I                  14 don't know. But, yeah.                  15 <b>Q. Do you know if it references a website that</b>                  16 <b>it's in connection with?</b>                  17 A. No, it doesn't -- I'm looking at all the                  18 invoices. It just says -- I think it's just a                  19 platform where you can put hundreds of websites on                  20 there if you want. That's what it looks like. I                  21 could have had it on multiple sites, but now there's                  22 not a -- it doesn't mention websites on any of them.                  23 <b>Q. Does that refresh your memory that you've</b>                  24 <b>used the service before?</b></p>	<p style="text-align: right;">Page 87</p> <p>1 shows the same bills you're showing me, and then it                  2 shows me my credit card expired in 2018 and nothing                  3 else. So I don't know what it was.                  4 <b>Q. So this would have been three years ago.</b>                  5 <b>Do you have any memory of still working with</b>                  6 <b>SnappyAutoInsurance at that time?</b>                  7 A. No.                  8 <b>Q. Even if you were paying for a service?</b>                  9 A. I'd have to look at Mailgun and see what's                  10 in there. I could have had multiple sites in there                  11 and I was doing something and this happened to be                  12 one of them. I don't know when it was actually used                  13 or what, but I don't -- I don't even know what                  14 Mailgun does, to be honest with you, until you just                  15 said that. I'm looking it up. And none of their                  16 e-mails list any of the websites, so I'd have to                  17 find a log-in or something and you can get in there                  18 and see what it does.                  19 <b>Q. Is there a reason why you would have been</b>                  20 <b>paying for this rather than Mr. Brown?</b>                  21 A. Like I said, I don't know. We would                  22 collaborate on stuff. So it was something at one                  23 point we were testing and that site happened to be                  24 in there. Maybe I'm still paying for a service I</p>
<p style="text-align: right;">Page 86</p> <p>1 A. I still don't even know what the service                  2 is. I'm now trying to figure it out, because                  3 they're charging me randomly like \$5 a month, so I                  4 don't know what -- It's not a lot of money, but I'm                  5 wondering what I'm paying for. But, no, it does not                  6 mention any websites in either of the e-mails.                  7 <b>Q. So I would ask for copies of those e-mails</b>                  8 <b>that you have from Mailgun.</b>                  9 A. Okay.                  10 <b>Q. So you don't recall using this service for</b>                  11 <b>SnappyAutoInsurance?</b>                  12 A. No. It doesn't even tell me what sites are                  13 on here. It just shows an invoice and a bill.                  14 <b>Q. But we do have a subpoena response from</b>                  15 <b>Mailgun Technologies that indicates that you used</b>                  16 <b>the service for SnappyAutoInsurance.com. Do you</b>                  17 <b>have any reason to disagree that that happened?</b>                  18 A. I mean if they're saying I did, then I                  19 don't know. I mean maybe -- I have so many sites.                  20 I don't know.                  21 <b>Q. And this would have been in 2017 according</b>                  22 <b>to Mailgun's records, correct?</b>                  23 A. Correct, but I don't know -- According to                  24 their e-mails, I see some stuff from '17. It just</p>	<p style="text-align: right;">Page 88</p> <p>1 didn't even realize. I don't know. Did they tell                  2 you the last time I logged in or what other sites I                  3 used it for? It doesn't tell me here, so I don't                  4 know.                  5 <b>Q. We're talking about what you know at this</b>                  6 <b>point. And so your memory is you don't recall using</b>                  7 <b>the service?</b>                  8 A. No. I used the service, but I don't recall                  9 what I used it for or what sites I used it for, just                  10 based on what you're saying here or showing me.                  11 <b>Q. And you're not sure what services they even</b>                  12 <b>provide?</b>                  13 A. I'm not. And I just looked through their                  14 e-mails while we are on this call. And I see these                  15 two bills right here, and literally these are the                  16 only two bills I see. And everything else just                  17 shows zero dollars, but nothing shows websites. And                  18 it shows my credit card expired. So I don't know                  19 what it is for.                  20 <b>Q. Are you seeing an e-mail on your screen,</b>                  21 <b>screen share?</b>                  22 A. No.                  23 <b>Q. What about now?</b>                  24 A. Yes.</p>



<p style="text-align: right;">Page 89</p> <p>1 Q. I'm showing you what's been marked as                  2 Exhibit 8. And this is an e-mail from Josh Odom                  3 from Mailgun Technologies to plaintiffs' attorneys                  4 in this case. So I can represent to you that                  5 essentially plaintiffs' attorneys were looking for                  6 more information about Mailgun's subpoena response.                  7 And Mailgun says the zip code associated with the                  8 card is 33498. Is that your zip code?                  9 A. Correct.                  10 Q. And you see that the name associated with                  11 the card is Justin Cohen. Do you see that?                  12 A. No.                  13 Q. You don't see that under number two?                  14 A. Oh, yeah. I see it there.                  15 Q. And so he's saying the account isn't                  16 closed. The credit card is expired. Our service                  17 has a pay-as-you-go option. Account last generated                  18 billable usage in June 2017. Do you see that?                  19 A. I do see that.                  20 Q. Does this refresh your memory of using                  21 Mailgun Technologies?                  22 A. No. Still the same thing as on this.                  23 Q. But you have no reason to disagree with the                  24 records that at some point you did pay for their</p>	<p style="text-align: right;">Page 91</p> <p>1 right in there. I've got it. Sorry.                  2 MS. KINGSTON: That's all right.                  3 Q. All right, Mr. Cohen. Can you see that on                  4 your screen?                  5 A. Yes.                  6 Q. I'll represent to you that this was                  7 GoDaddy's response to plaintiffs' subpoena seeking                  8 information about the owner of the website                  9 SnappyAutoInsurance.com. Do you see that it has the                  10 name Adam Brown?                  11 A. Yup.                  12 Q. Do you have any reason to doubt that Adam                  13 Brown created this domain name?                  14 A. No. I'm sure he did.                  15 Q. And you're basing that off of the documents                  16 that I'm showing you?                  17 A. Yeah.                  18 Q. Do you have any memory at all of him                  19 creating this website?                  20 A. No. 2008, I mean that was a long time ago.                  21 Q. Well, I think just from viewing this                  22 document, I can tell you I think 2008 is when he                  23 created this account but not this domain name.                  24 A. Okay.</p>
<p style="text-align: right;">Page 90</p> <p>1 services?                  2 A. I'm sure I did. I see e-mails from it. I                  3 just don't know what it's for and what websites I                  4 used.                  5 Q. And, just for the record, you're going to                  6 be providing us copies of those e-mails, correct?                  7 A. Sure.                  8 Q. I'm going to show you what's been marked as                  9 Exhibit 9. Can you see that okay?                  10 A. Now I do.                  11 Q. So this is a subpoena that was issued in                  12 this lawsuit by plaintiffs' attorneys to                  13 GoDaddy.com, Inc. looking for all documents relating                  14 to the owner of the website SnappyAutoInsurance.com                  15 including name, contact information, and billing and                  16 invoice. Do you see that?                  17 A. Yes.                  18 Q. Now I'm going to show you --                  19 MR. BRODERICK: Christine, just for                  20 the record, I don't think Schedule A is actually                  21 attached to this.                  22 MS. KINGSTON: I don't think there was                  23 a schedule, Ted.                  24 MR. BRODERICK: Oh, I see. It's just</p>	<p style="text-align: right;">Page 92</p> <p>1 Q. Do you see that log-in name, Emma2304?                  2 A. I see it, yes.                  3 Q. Does that look familiar to you?                  4 A. No.                  5 Q. Have you ever seen that before?                  6 A. It looks more like a password, but, no.                  7 Q. And do you see that address?                  8 A. Yes. It's my old address.                  9 Q. So that's the house that you owned from                  10 2007 to 2016, correct?                  11 A. Yes.                  12 Q. Do you know why he would have put your --                  13 Strike that. You rented the house to him at some                  14 point, correct?                  15 A. Exactly, yeah. It was probably during that                  16 time. I don't know the year. He'll probably know                  17 better.                  18 Q. So does this suggest that he was living at                  19 that house when he created this domain name?                  20 A. I have no clue. I mean he could have lived                  21 there. He might have lived there and used that                  22 address. I don't know.                  23 Q. And going down, is that his phone number?                  24 A. Yeah.</p>

<p style="text-align: right;">Page 93</p> <p>1 Q. Is that his cell phone?</p> <p>2 A. Yeah.</p> <p>3 Q. And is that his e-mail?</p> <p>4 A. Yup.</p> <p>5 Q. Okay. For the record, that's</p> <p>6 AdamB11480@gmail.com. So we're on the second page</p> <p>7 of Exhibit 10 and it has a creation date of</p> <p>8 September 24, 2013. Do you see that?</p> <p>9 A. Yup.</p> <p>10 Q. Does that refresh your memory of when this</p> <p>11 website was created?</p> <p>12 A. No.</p> <p>13 Q. So you have no memory at all of this</p> <p>14 website being created?</p> <p>15 A. No.</p> <p>16 Q. And no --</p> <p>17 A. Not when or where. I mean, like I said, I</p> <p>18 don't know.</p> <p>19 Q. What do you have a memory of?</p> <p>20 A. The name sounds familiar, but I don't know</p> <p>21 what we did with it. I think it was failed and I</p> <p>22 don't recall anything beyond that.</p> <p>23 Q. And do you see here it expires on September</p> <p>24 24, 2020?</p>	<p style="text-align: right;">Page 95</p> <p>1 there a way to make it -- to basically scrub it off</p> <p>2 the Internet?</p> <p>3 MR. BRODERICK: Objection.</p> <p>4 A. I don't know. I never had to do that.</p> <p>5 Usually if I just cancel a site, it just goes away.</p> <p>6 Q. When you cancel a site, do you cancel the</p> <p>7 hosting?</p> <p>8 A. I just let it expire.</p> <p>9 Q. Okay. I'm going to go down to some of the</p> <p>10 entries here. I'm on page 17 of Exhibit 10. Can</p> <p>11 you see that clearly?</p> <p>12 A. Yes.</p> <p>13 Q. So what this is indicating to me is that</p> <p>14 Adam Brown paid for services on GoDaddy for</p> <p>15 SnappyAutoInsurance on September 24, 2013. Do you</p> <p>16 see that?</p> <p>17 A. Right now it says Zoom. I don't see</p> <p>18 anything.</p> <p>19 Q. You can't see the document?</p> <p>20 A. No.</p> <p>21 Q. Can you see the document clearly now?</p> <p>22 A. Yeah.</p> <p>23 Q. So you see that it's reflecting a</p> <p>24 transaction that occurred, correct?</p>
<p style="text-align: right;">Page 94</p> <p>1 A. Yup.</p> <p>2 Q. Indicating that this site is still active,</p> <p>3 correct?</p> <p>4 A. I guess so. It doesn't go to a domain,</p> <p>5 last time I checked, unless it's active. I don't</p> <p>6 know. It's not my account.</p> <p>7 Q. In your experience using GoDaddy, and I'm</p> <p>8 talking just generally, can you pay for a domain</p> <p>9 name but not have it active?</p> <p>10 A. Yeah. People have thousands of domain</p> <p>11 names just sitting there that they just keep just to</p> <p>12 sell one day or they don't want anyone else to use</p> <p>13 them.</p> <p>14 Q. And how do you make a site not active?</p> <p>15 What are the steps that you have to take?</p> <p>16 A. I don't really know. I just don't think</p> <p>17 you ever put a URL on it or you're hosting expires.</p> <p>18 If your hosting expires, your site goes down.</p> <p>19 Q. And hosting through GoDaddy or is that for</p> <p>20 another --</p> <p>21 A. Just anywhere, but you pay monthly for it.</p> <p>22 So if you don't have it hosted, then the site won't</p> <p>23 show up.</p> <p>24 Q. What if you're paying for it still; is</p>	<p style="text-align: right;">Page 96</p> <p>1 MR. BRODERICK: Objection.</p> <p>2 A. I mean yeah, but -- Yeah, sure.</p> <p>3 Q. Okay. And it seems to be that Adam Brown</p> <p>4 is paying for GoDaddy services. Do you see that?</p> <p>5 A. I --</p> <p>6 MR. BRODERICK: Objection.</p> <p>7 Q. Have you ever paid for services through</p> <p>8 GoDaddy?</p> <p>9 A. They're not my main register, but, yeah,</p> <p>10 sometimes.</p> <p>11 Q. Do any of these services look familiar to</p> <p>12 you, .comdomainnameregistration?</p> <p>13 A. Yes. That's just registering domain names,</p> <p>14 yeah.</p> <p>15 Q. So speaking more generally, have you ever</p> <p>16 paid for a service like that through GoDaddy?</p> <p>17 A. Of course.</p> <p>18 Q. And what's the link you usually pay for?</p> <p>19 A. Me? I do a year or two. Everyone is</p> <p>20 different. Sometimes you can buy five years.</p> <p>21 Sometimes you can buy one year. The more you buy,</p> <p>22 the cheaper it is. If you forget to cancel, they</p> <p>23 automatically bill you every year, so it depends.</p> <p>24 Q. Do you have any knowledge of Adam Brown</p>

<p style="text-align: right;">Page 97</p> <p>1 paying for this in 2013?</p> <p>2 A. No, but it says recurring charge. It means</p> <p>3 it's an auto re-bill, so as long as the credit card</p> <p>4 doesn't expire, it's automatically just re-billed.</p> <p>5 Q. Where does it say recurring?</p> <p>6 A. It says, "One year recurring" right next to</p> <p>7 the second line.</p> <p>8 Q. So the .netdomainnameregistration, but what</p> <p>9 about that --</p> <p>10 A. Autoinsurance.com, it says one year</p> <p>11 recurring, so it means every --</p> <p>12 Q. Okay. I see where you're at. In your</p> <p>13 experience, this means it will re-bill every year?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. You have no knowledge of Adam Brown</p> <p>16 paying for it?</p> <p>17 A. No, but in a minute I'm going -- I'm trying</p> <p>18 to stall.</p> <p>19 Q. I'm happy to take a short break. So we</p> <p>20 still have ground to cover, so we're going to have</p> <p>21 to keep going.</p> <p>22 A. Okay.</p> <p>23 Q. If you want a short break to take a call,</p> <p>24 I'm happy to accommodate you.</p>	<p style="text-align: right;">Page 99</p> <p>1 want it to get to that point.</p> <p>2 A. We can set another date. That's not a</p> <p>3 problem.</p> <p>4 Q. Here's what we're going to do. We're going</p> <p>5 to go off the record until 1 o'clock which will give</p> <p>6 you time to complete your calls. We're going to get</p> <p>7 back on at 1 so we can complete this deposition.</p> <p>8 Okay? All right?</p> <p>9 A. Yes. Thanks.</p> <p>10 MS. KINGSTON: We will be back on at</p> <p>11 1. And we are off the record.</p> <p>12 (Lunch recess taken at 1:03 p.m.)</p> <p>13 Q. So, Mr. Cohen, we're back on the record.</p> <p>14 You're still under oath. Have you been in contact</p> <p>15 with Adam Brown at all today?</p> <p>16 A. No.</p> <p>17 Q. So you've had no contact at all with him</p> <p>18 during your deposition at any point?</p> <p>19 A. During my deposition, no.</p> <p>20 Q. What about during the break we just took?</p> <p>21 A. No. I had lunch.</p> <p>22 Q. So you haven't been in touch with him at</p> <p>23 all today? Sorry. If you answered, I didn't hear</p> <p>24 your answer.</p>
<p style="text-align: right;">Page 98</p> <p>1 A. We can come back at 1.</p> <p>2 Q. I want to be clear, but --</p> <p>3 A. I'll try. I mean I have to work. I'm</p> <p>4 giving you time. I can't give you my whole day.</p> <p>5 I'm sorry.</p> <p>6 Q. Well, again, you're under subpoena to</p> <p>7 testify, so I can't help you.</p> <p>8 A. That's up to you. I'm giving you options</p> <p>9 here. You can't force me to stay on here. I have</p> <p>10 to work. Unless you want to pay me for the day,</p> <p>11 I'll stay on all day long.</p> <p>12 Q. Here's what we're going to do. We're going</p> <p>13 to take a lunch break until 1. We're going to get</p> <p>14 back on at 1, and I'll try to get you in and out as</p> <p>15 quickly as I can, but I can't promise you. And so</p> <p>16 we'll have to go as long as I need at 1.</p> <p>17 A. We'll just have to keep getting off. Just</p> <p>18 go as quickly as you can. I can't stop my calls.</p> <p>19 Unless you guys are paying me for the day, I have to</p> <p>20 work.</p> <p>21 Q. The options are either we complete this</p> <p>22 today and if we can't complete this today, then</p> <p>23 we'll have to set another date. If you can't do</p> <p>24 that, then we do have an open court case, so I don't</p>	<p style="text-align: right;">Page 100</p> <p>1 A. No, I haven't talked to him during the</p> <p>2 deposition.</p> <p>3 Q. What about today?</p> <p>4 A. A message, but nothing related to this.</p> <p>5 Q. You mean through text messages?</p> <p>6 A. More Skype. Just nothing related to this.</p> <p>7 Just work.</p> <p>8 Q. You didn't discuss your deposition at all?</p> <p>9 A. No. I just said I had it today.</p> <p>10 Q. What else did you talk about relative to</p> <p>11 this case?</p> <p>12 A. Nothing relative to the case.</p> <p>13 Q. Nothing at all about SnappyAutoInsurance?</p> <p>14 A. No.</p> <p>15 Q. I'm going to show you what's marked Exhibit</p> <p>16 17 and then I'm going to screen share that. Can you</p> <p>17 see that okay?</p> <p>18 A. Yup.</p> <p>19 Q. So showing you Exhibit 17, these are copies</p> <p>20 of e-mails we received from you and Mr. Brown on</p> <p>21 September 2nd.</p> <p>22 A. Yup.</p> <p>23 Q. Do you recognize these e-mails?</p> <p>24 A. Yes, I do.</p>

Page 101

1 Q. So there's an e-mail from you at 2:35, and  
2 then there's an e-mail from Dirty Jeeps,  
3 AdamB11480@gmail.com at 2:38. Do you see that?  
4 A. Yes.  
5 Q. And that's Adam's e-mail, correct?  
6 A. Correct.  
7 Q. And would you agree with me that the  
8 substance of these two e-mails is essentially the  
9 same?  
10 A. They are. I told him I was going to write  
11 back, and he said the same.  
12 Q. Did you coordinate these responses?  
13 A. No. I wrote back and I said, "Look what I  
14 wrote," and then he said he was going to reply. He  
15 agreed with what I said, so I'm sure he probably  
16 wrote something very similar or the same.  
17 Q. And when you were talking, was that over  
18 the phone?  
19 A. Probably. I don't recall, but I'm sure.  
20 We talk a lot every day, so --  
21 Q. But relative to these e-mails specifically,  
22 were you speaking about them by e-mail or over the  
23 phone?  
24 A. Could have been over the phone. Could have

Page 102

1 been in person. I don't -- Probably over the phone.  
2 Q. What about by e-mail?  
3 A. No.  
4 Q. You did not e-mail Adam Brown about this?  
5 A. No. I just replied to all. He's on the  
6 e-mail. He saw it himself.  
7 Q. Just a moment ago you said that you spoke  
8 to him that you were going to respond.  
9 A. No. I'm saying he's on the e-mail. I  
10 didn't speak to him also via e-mail. Yeah, I spoke  
11 on the phone telling him I'm going to respond.  
12 Q. So that conversation was over the phone?  
13 A. I believe so, yeah.  
14 Q. Okay.  
15 A. Or I probably called and said, I just  
16 responded. One of the two. I don't recall exactly  
17 what I did, but I told him I was responding either  
18 way.  
19 Q. But your memory is that that was by  
20 telephone call?  
21 A. Correct.  
22 Q. Did you tell him to respond in a similar  
23 manner?  
24 A. No.

Page 103

1 Q. And that's your language from the first  
2 e-mail?  
3 A. Yeah, I wrote that.  
4 Q. Okay. Earlier I showed you the GoDaddy  
5 subpoena response. Do you recall that? It was an  
6 Excel spreadsheet.  
7 A. Yes.  
8 Q. So that subpoena response indicates that  
9 Adam Brown was paying for the domain name  
10 SnappyAutoInsurance.com through 2020. Are you aware  
11 of that?  
12 A. Now I am from what you showed me, but I  
13 don't know what that has to do with me.  
14 Q. Were you aware that he was still paying for  
15 the website?  
16 A. No.  
17 Q. And I think you testified you don't know  
18 who's currently, if anyone, running  
19 SnappyAutoInsurance.com; is that right?  
20 A. That's correct.  
21 Q. And when is the last time you knew who was  
22 running that?  
23 A. Probably when Adam and I did like -- if we  
24 did something with it. I don't know. Whenever that

Page 104

1 was. Probably when it was first created. I don't  
2 know the year. A long time ago.  
3 Q. To your knowledge, would Adam Brown have  
4 been running it at that time?  
5 A. Not that I know of.  
6 Q. You said not that you know of?  
7 A. Not that I know of, yes.  
8 Q. What do you mean by that?  
9 A. Meaning I don't know if he was running it  
10 or not. I don't recall.  
11 Q. Do you have any knowledge of whether any  
12 leads generated from the website are fraudulent?  
13 A. No, I don't. Adam doesn't do -- We don't  
14 do fraudulent stuff, so, no.  
15 Q. So your testimony is you don't believe that  
16 leads generated from that website would be  
17 fraudulent?  
18 MR. BRODERICK: Objection.  
19 A. No, not on purpose, not from us.  
20 Q. And, again, you're not aware of who  
21 currently runs that website?  
22 A. No.  
23 Q. And you're not aware of who ran it in 2019?  
24 A. No.

<p style="text-align: right;">Page 105</p> <p>1 Q. So if someone else is running this website                  2 besides you or Adam Brown, you have no way of                  3 knowing whether leads created were fraudulent or                  4 not; is that accurate?                  5 A. Accurate.                  6 Q. Do you recall telling the plaintiffs'                  7 attorneys that Mr. Mantha's lead is fraudulent?                  8 A. No.                  9 Q. You don't. Okay. And is it fair to say                  10 that you have no way of knowing that?                  11 A. Yeah, I have no way of knowing.                  12 Q. Did you enter anyone's personal information                  13 on SnappyAutoInsurance.com in 2019?                  14 A. No. I don't enter anyone's information on                  15 any site. They do it themselves.                  16 Q. So it's your testimony that you didn't                  17 fraudulently create the lead at issue in this case?                  18 A. No.                  19 Q. Have you ever heard of the name of Joe                  20 Mantha before?                  21 A. No.                  22 Q. When is the first time you heard that name?                  23 A. When I got paperwork from one of the                  24 lawyers. Probably this.</p>	<p style="text-align: right;">Page 107</p> <p>1 related to this website.                  2 Q. And what do you mean by your portfolio?                  3 A. Just the domains I own, just checked what I                  4 owned. And I didn't own the website and I didn't                  5 have any correspondence about the website in any of                  6 my e-mails, so that's it.                  7 Q. So you have a portfolio where you list all                  8 of the domain names that you own?                  9 A. Well, no. Just like inside GoDaddy, inside                  10 all different registers where I buy domain names                  11 from.                  12 Q. So you looked at your accounts on all of                  13 those hosting sites?                  14 A. Correct, and I never saw this website.                  15 Q. Did you see any Snappy websites?                  16 A. No.                  17 Q. And do you remember besides GoDaddy where                  18 you searched?                  19 A. Probably One and One.                  20 Q. And did you search GoDaddy for this                  21 website?                  22 A. Yeah, I'm sure I did. I'm sure I looked at                  23 all my stuff I had saved.                  24 Q. But, as you sit here today, can you recall</p>
<p style="text-align: right;">Page 106</p> <p>1 Q. Probably the subpoena?                  2 A. Yes.                  3 Q. Do you have knowledge of anyone else                  4 fraudulently creating leads on                  5 SnappyAutoInsurance.com?                  6 A. No.                  7 Q. And I think you said that your testimony                  8 was that Adam Brown does not fraudulently create                  9 leads?                  10 A. No, he does not.                  11 Q. Has anyone ever accused you or Adam Brown                  12 of fraudulently creating leads?                  13 A. Nope.                  14 Q. When did you first learn that this lawsuit                  15 had been filed?                  16 A. I don't know. Whenever you guys sent me                  17 something. I didn't keep track of the dates.                  18 Q. And when you first received a copy of the                  19 subpoena, did you take any steps to investigate?                  20 A. Yeah. I looked if I had any relation to                  21 the site, which I didn't, and that was about it.                  22 Q. And how did you look to see that?                  23 A. Just looked through my portfolio and looked                  24 through my e-mails, and I didn't see anything</p>	<p style="text-align: right;">Page 108</p> <p>1 if you did that?                  2 A. I recall I don't -- I didn't see it in any                  3 of my things, so, yeah.                  4 Q. What e-mails did you search?                  5 A. What e-mails? What do you mean?                  6 Q. The e-mail we've been corresponding with                  7 you is Justin@Blueflame.com; is that correct?                  8 A. Correct.                  9 Q. Is that your primary work e-mail?                  10 A. Correct.                  11 Q. Did you search that e-mail for anything                  12 related to SnappyAutoInsurance?                  13 A. Yes. There's nothing there.                  14 Q. What other e-mails do you use?                  15 A. That's it for that -- I mean that I would                  16 talk about that.                  17 Q. What about -- We found e-mails on the                  18 Mailgun subpoena response. I think it was                  19 BlueflameWeb@gmail.com. Do you still use that?                  20 A. That's just my PayPal e-mail address. I                  21 don't use it for correspondence.                  22 Q. Did you search that for anything relating                  23 to Snappy?                  24 A. No. I don't think there's anything there.</p>



<p style="text-align: right;">Page 109</p> <p>1 Q. So I'd ask that you go back and do that in                  2 addition to giving us the Mailgun e-mails.                  3 A. I'm looking right now.                  4 Q. We don't have a lot of time. If you can                  5 just do that after.                  6 A. Go ahead.                  7 Q. Besides these two e-mails, do you use any                  8 other e-mails?                  9 A. No.                  10 Q. Did you use any other e-mails from 2013 to                  11 present?                  12 A. No.                  13 Q. So it's just Justin@Blueflamemail.com and                  14 BlueflameWeb@gmail.com?                  15 A. Related to business, yeah.                  16 Q. And so you have other personal e-mail                  17 addresses?                  18 A. Personally. I have nothing business                  19 related.                  20 Q. Is it possible that you would have received                  21 e-mail that went into your business there?                  22 A. Those are not on the gmail. I don't keep                  23 it on my main platform.                  24 Q. I'm going to show you what's been marked as</p>	<p style="text-align: right;">Page 111</p> <p>1 A. If that's what that says, yeah. I mean I                  2 don't know what this is regarding or what, but,                  3 yeah.                  4 Q. So he's responding to requests for                  5 information about SnappyAutoInsurance, and he says,                  6 "We took this site off line about four months ago,"                  7 but your testimony is that you have no knowledge of                  8 that whatsoever; is that accurate?                  9 A. Yeah. It's not my site.                  10 Q. So he never spoke to you about this?                  11 A. No.                  12 Q. And the "we" in that sentence is not                  13 referring to you; is that accurate?                  14 A. I don't even -- I'm not on this e-mail, so,                  15 yeah. I don't know what this is.                  16 Q. You testified earlier you thought he sold                  17 Offervision and including SnappyAutoInsurance.com;                  18 is that right?                  19 A. Correct.                  20 Q. Do you know why he would be taking this                  21 site off line in 2020 if he doesn't own it anymore?                  22 A. It's possible he was still hosting it. I'm                  23 not sure.                  24 Q. Do you have any personal knowledge of that?</p>
<p style="text-align: right;">Page 110</p> <p>1 Exhibit 11. Can you see that?                  2 A. Yup.                  3 Q. So these are e-mails -- This is Exhibit 11.                  4 These are e-mails between Adam Brown and plaintiffs'                  5 attorneys in this case. And I'm looking at --                  6 There's an e-mail from Adam Brown on June 30, 2020,                  7 and he says, "We took this sit," which I took to                  8 mean site, "off line about four months ago, so we                  9 should not have any problems anymore." Do you see                  10 that?                  11 A. Yup.                  12 Q. Do you have any idea what he's talking                  13 about here?                  14 A. No.                  15 Q. So you have knowledge that he took                  16 SnappyAutoInsurance off line?                  17 A. No.                  18 Q. Did he ever talk to you about taking it off                  19 line?                  20 A. No. I just talked to him about the site,                  21 and he said he doesn't know what the deal was with                  22 it. He was going to look. So, no.                  23 Q. Is this the first time you're hearing that                  24 he took the site off line?</p>	<p style="text-align: right;">Page 112</p> <p>1 A. No.                  2 Q. Did Mr. Brown talk to you about this                  3 e-mail?                  4 A. No.                  5 Q. Has he ever told you about conversations he                  6 had with plaintiffs' attorneys?                  7 A. Yes.                  8 Q. What did he say?                  9 A. Basically that you guys were asking about                  10 the site, the same stuff that we talked about, and                  11 that he was looking into it, and that he thought he                  12 might have sold it. That's really it. If he wrote                  13 it, he's taking it down, I don't know. Maybe he was                  14 still hosting it and didn't have control. I don't                  15 know. You'd have to ask him.                  16 Q. But he never mentioned that to you?                  17 A. No.                  18 Q. I'm going to show you what has been marked                  19 as Exhibit 12. Can you see that okay?                  20 A. Yup.                  21 Q. Okay. Can you see that all right?                  22 A. Yes.                  23 Q. I'm looking at an e-mail you sent on May                  24 8th to the plaintiffs' attorneys in this case. Do</p>

<p style="text-align: right;">Page 113</p> <p>1 you see the beginning of that e-mail?</p> <p>2 A. Yes.</p> <p>3 Q. So I'm just going to ask you about the</p> <p>4 closing line here. It says, "Looking in further at</p> <p>5 that time, I thought I owned this site. I don't</p> <p>6 even own it." Do you see that?</p> <p>7 A. Correct.</p> <p>8 Q. When you said you thought you owned this</p> <p>9 site, what did you mean by that?</p> <p>10 A. Well, by then -- by all the stuff I'm</p> <p>11 getting, I thought I owned this website. And that's</p> <p>12 when I looked through. And I don't even own it,</p> <p>13 because I thought I was getting subpoenaed for</p> <p>14 something and I was telling you I don't own the</p> <p>15 site.</p> <p>16 Q. And that was after you looked at -- you</p> <p>17 think you looked at the GoDaddy site to see if you</p> <p>18 own it?</p> <p>19 A. Probably, yeah.</p> <p>20 Q. But you don't know one way or the other</p> <p>21 sitting here if you did that; is that accurate?</p> <p>22 A. Yeah, I don't know. All I know is I looked</p> <p>23 to see if I owned the website and I didn't, and</p> <p>24 that's what I replied back.</p>	<p style="text-align: right;">Page 115</p> <p>1 Q. And I think you testified Mr. Brown has not</p> <p>2 mentioned who he sold Offervision to?</p> <p>3 A. I don't know. I forget. But that's a</p> <p>4 phone. That -- That site doesn't even collect a zip</p> <p>5 code. It doesn't even collect phone numbers. So</p> <p>6 how does that even relate?</p> <p>7 Q. What website doesn't collect phone numbers?</p> <p>8 A. I'm saying the site you showed me, there's</p> <p>9 no phone number thing and this is showing a phone</p> <p>10 number, so how does it have the same data?</p> <p>11 Q. You mean the initial screen shot that we</p> <p>12 looked at earlier?</p> <p>13 A. Yes.</p> <p>14 Q. Let's go back and look at that, then.</p> <p>15 A. It had a phone number on there, but it</p> <p>16 didn't collect anyone's phone number, from what I</p> <p>17 saw.</p> <p>18 Q. I'm showing you what was previously marked</p> <p>19 as Exhibit 3. So you're talking about this web</p> <p>20 form?</p> <p>21 A. Yeah. What's the next page of it? Because</p> <p>22 I don't even see anything that asks for someone's</p> <p>23 phone number.</p> <p>24 Q. You don't see it on this page, but, again,</p>
<p style="text-align: right;">Page 114</p> <p>1 Q. So, at that time, you had no memory of</p> <p>2 whether you owned it?</p> <p>3 A. No.</p> <p>4 Q. I'm going to show you what's been marked as</p> <p>5 Exhibit 13. Can you see that?</p> <p>6 A. Uh-huh.</p> <p>7 Q. So this is an e-mail that was produced by</p> <p>8 George Rios. It's an e-mail from Dario Osmancevic</p> <p>9 with FenixLeads.com to George Rios. And I think you</p> <p>10 said you've never heard of someone named Dario</p> <p>11 Osmancevic?</p> <p>12 A. Yeah, I have no clue who that is.</p> <p>13 Q. And have you ever heard of FenixLeads?</p> <p>14 A. No.</p> <p>15 Q. And do you know someone named George Rios?</p> <p>16 A. No clue.</p> <p>17 Q. So Mr. Osmancevic was providing lead</p> <p>18 information for the lead at issue in this case, and</p> <p>19 this is what he provided. Have you seen any of this</p> <p>20 information before?</p> <p>21 A. No.</p> <p>22 Q. And do you know why he's describing Adam</p> <p>23 Brown as the owner of the site?</p> <p>24 A. No clue. I don't know who this is.</p>	<p style="text-align: right;">Page 116</p> <p>1 you said you testified you've never seen this page</p> <p>2 before, correct? You have no memory of it?</p> <p>3 A. Correct, but I'm saying if there's odd</p> <p>4 information, where is it being filled, because I</p> <p>5 don't see anything here that shows that.</p> <p>6 Q. You told me you've built websites before.</p> <p>7 Is it possible that you entered your zip code here</p> <p>8 and then you provided more information on the next</p> <p>9 page?</p> <p>10 A. Yeah. I don't know about Adam, but I know</p> <p>11 the majority of all our sites that we've done</p> <p>12 together or that I built or he built doesn't even</p> <p>13 collect a phone number. Most people just want the</p> <p>14 e-mail address.</p> <p>15 Q. So the majority of sites you've built, you</p> <p>16 wouldn't be collecting phone numbers?</p> <p>17 A. Correct.</p> <p>18 Q. And that's also true of Adam Brown?</p> <p>19 A. From what I know, yeah.</p> <p>20 Q. And do you have any specific memory of if</p> <p>21 SnappyAutoInsurance collected phone numbers?</p> <p>22 A. Not at all, but based on this, I don't</p> <p>23 think it would because it's telling you to call a</p> <p>24 phone number and it's asking for a zip code.</p>

<p style="text-align: right;">Page 117</p> <p>1 Q. But I think I just asked you that it's                  2 possible that there's a second page where you enter                  3 additional information; is that right?                  4 A. That's possible, sure. I don't own the                  5 site.                  6 Q. And would you typically collect the                  7 consumer's name?                  8 A. Yeah. Name and e-mail address is typically                  9 what gets collected on the next page.                  10 Q. So is it fair to say there is a second page                  11 for this website where that information is                  12 collected?                  13 MR. BRODERICK: Objection.                  14 A. It's possible. Or it's an iframe. Like                  15 All Web Leads and stuff you entered before, they                  16 provide a form for you and they just place it right                  17 there and so you never even see that data. So                  18 you -- There's many ways -- You don't build websites                  19 and never even see the data. You can do it that way                  20 too. If there's a form on there for one of the                  21 companies, you'll never even see that data. You're                  22 just hosting the site. There's many different ways                  23 it can be collected. I don't know. It's not my                  24 site.</p>	<p style="text-align: right;">Page 119</p> <p>1 Q. How many of your websites did you run that                  2 way?                  3 A. Throughout the years, a lot on and off. I                  4 don't know. All companies come and go that do that                  5 stuff. I don't even know if they still do it.                  6 Q. Do you have an account with All Web Leads?                  7 A. I might have at some point. Not that I am                  8 aware of. I don't even know if they're still                  9 around.                  10 Q. If All Web Leads was used for this website,                  11 how we would find that out?                  12 A. You would have to ask the owner of the                  13 site. I don't know.                  14 Q. I'm going to show you what's been marked as                  15 Exhibit 14. Can you see that all right?                  16 A. Yup.                  17 Q. All right. So this is an e-mail that was                  18 sent -- provided to us by George Rios of Plural                  19 Marketing, and there's an e-mail sent by Dario                  20 Osmancevic to George Rios on July 28, 2020. And                  21 Mr. Osmancevic says he's providing a screen shot of                  22 SnappyAutoInsurance form, and he says, "I can most                  23 certainly say that Joe Mantha has signed up on our                  24 website and filled up the application in full by</p>
<p style="text-align: right;">Page 118</p> <p>1 Q. Tell me a little more about that. You said                  2 if All Web Leads were involved, there's a way you                  3 can never see the data?                  4 A. It will go directly to All Web Leads. You                  5 would put their form. Right where it says enter zip                  6 code, it wouldn't be your website's form. They                  7 integrate their forms onto people's websites. So if                  8 you filled it out, it would just go right directly                  9 to All Web Leads and they would go sell that lead to                  10 whoever they would sell it to and just pay you for                  11 that lead.                  12 Q. And how would you know from looking at a                  13 web form if that was the case?                  14 A. You need to look at the back code and see                  15 if All Web Leads is integrated into it.                  16 Q. So we wouldn't be able to tell by looking                  17 at this; is that correct?                  18 A. No. You need the code on the back of that.                  19 Q. So, practically speaking, how would that                  20 happen? When a consumer goes to enter their zip                  21 code, would something else pop up?                  22 A. Yeah, probably pop up or redirect it to an                  23 All Web Leads form or whatever company they're                  24 using.</p>	<p style="text-align: right;">Page 120</p> <p>1 himself." And then he also calls himself the                  2 webmaster. Do you see that?                  3 A. Yes. No clue who that is.                  4 Q. Have you ever seen this e-mail before?                  5 A. Nope.                  6 Q. Are you surprised to learn that this person                  7 is calling himself the webmaster of                  8 SnappyAutoInsurance?                  9 A. I'm not surprised because I don't know what                  10 the site is. I don't know who owns it now or what.                  11 Obviously someone is still managing the site.                  12 Q. And is it possible that Mr. Brown sold the                  13 website to this person, Dario Osmancevic?                  14 A. Could have. You'd have to ask him. But I                  15 mean that pretty much gives you right there, that's                  16 the person you should be asking questions, someone                  17 writing back.                  18 Q. Have you ever provided any information on                  19 the website to Fenix Media?                  20 A. I've never heard of this person or this                  21 company.                  22 Q. You testified that you think the website                  23 was sold. Has anyone ever reached out to you for                  24 information or documents that you have?</p>

<p style="text-align: right;">Page 121</p> <p>1 A. No.</p> <p>2 <b>Q. If a website is sold and assuming that you</b></p> <p>3 <b>had some part in building it, is that normal that</b></p> <p>4 <b>they wouldn't reach out to you?</b></p> <p>5 MR. BRODERICK: Objection.</p> <p>6 A. Yeah. They don't always have to reach out.</p> <p>7 They can just -- If their website -- It depends what</p> <p>8 they're using it for. People just buy websites.</p> <p>9 They don't always need the past -- They don't always</p> <p>10 want the data from the past. They don't need it.</p> <p>11 <b>Q. Have you been involved in the selling of</b></p> <p>12 <b>lead aggregation websites?</b></p> <p>13 A. No.</p> <p>14 <b>Q. So you've never bought or sold one?</b></p> <p>15 A. No. I just build them. No.</p> <p>16 <b>Q. Do you know if that happens in the</b></p> <p>17 <b>industry?</b></p> <p>18 A. Yes, all the time.</p> <p>19 <b>Q. And, if that happens, it's fair to say</b></p> <p>20 <b>there would be a contract relating to it?</b></p> <p>21 A. I don't know. It depends on what --</p> <p>22 whoever made the deal. Couldn't tell you.</p> <p>23 <b>Q. Okay. Now we're going to look at what's</b></p> <p>24 <b>been marked as Exhibit 1. Do you see that all</b></p>	<p style="text-align: right;">Page 123</p> <p>1 A. I haven't talked to anyone about this</p> <p>2 lawsuit on e-mail.</p> <p>3 <b>Q. But you have talked to Attorney --</b></p> <p>4 A. Not anyone in this thing, I should say.</p> <p>5 <b>Q. Number five, any and all communications</b></p> <p>6 <b>between you and Fenix Media Solutions concerning the</b></p> <p>7 <b>subject matter of this lawsuit. Do you see that?</b></p> <p>8 A. Yeah. Never heard of them.</p> <p>9 <b>Q. So you've never had any e-mails or texts</b></p> <p>10 <b>with them?</b></p> <p>11 A. No.</p> <p>12 <b>Q. Going down to number nine, any and all</b></p> <p>13 <b>communications with any third party concerning this</b></p> <p>14 <b>lawsuit. Is there any other person you've</b></p> <p>15 <b>communicated by e-mail or by text or in any other</b></p> <p>16 <b>written form concerning this lawsuit?</b></p> <p>17 A. No. Just my wife.</p> <p>18 <b>Q. And what have you told her about the</b></p> <p>19 <b>lawsuit?</b></p> <p>20 A. I just asked what I should do. That's</p> <p>21 about it.</p> <p>22 <b>Q. And is she your attorney with respect to</b></p> <p>23 <b>this case?</b></p> <p>24 A. No. Just an opinion.</p>
<p style="text-align: right;">Page 122</p> <p>1 right?</p> <p>2 A. Yup.</p> <p>3 <b>Q. This is the subpoena to you in this case.</b></p> <p>4 <b>And we're going to look at some of the document</b></p> <p>5 <b>requests. Number three is any and all</b></p> <p>6 <b>communications between you and Adam Brown concerning</b></p> <p>7 <b>the subject matter of this lawsuit. Do you see</b></p> <p>8 <b>that?</b></p> <p>9 A. Yes.</p> <p>10 <b>Q. Did you search your files for these</b></p> <p>11 <b>documents?</b></p> <p>12 A. Yeah. I don't have any communications. I</p> <p>13 think I've spoken to him on the phone or in person.</p> <p>14 <b>Q. So you don't have any text messages between</b></p> <p>15 <b>you and Mr. Brown in this case?</b></p> <p>16 A. No.</p> <p>17 <b>Q. Or about Snappy?</b></p> <p>18 A. No, definitely not about Snappy.</p> <p>19 <b>Q. What about e-mails?</b></p> <p>20 A. No, not about this. Only the ones we were</p> <p>21 cc'd on.</p> <p>22 <b>Q. What about number four, any and all</b></p> <p>23 <b>communications between you and Seal Dog Media</b></p> <p>24 <b>concerning the subject matter of this lawsuit?</b></p>	<p style="text-align: right;">Page 124</p> <p>1 <b>Q. And were you asking about how to comply</b></p> <p>2 <b>with the subpoena?</b></p> <p>3 A. In general what -- you know, because I</p> <p>4 really don't have involvement with this site, so</p> <p>5 it's just kind of a lot of time wasted for something</p> <p>6 I can't give you answers for.</p> <p>7 <b>Q. And did you tell her that you had a role in</b></p> <p>8 <b>building the website?</b></p> <p>9 A. Yeah, but it doesn't -- Like everyone's</p> <p>10 told me, it doesn't -- I don't have anything if I</p> <p>11 don't -- It doesn't matter. I don't know.</p> <p>12 Something from eight, ten years ago that I don't</p> <p>13 have any -- I don't know. I don't have any</p> <p>14 information, so --</p> <p>15 <b>Q. Looking at number 12, any and all documents</b></p> <p>16 <b>that relate to whether, when, why the website was</b></p> <p>17 <b>taken out of service or off line in 2020. Do you</b></p> <p>18 <b>see that?</b></p> <p>19 A. Yes. Don't have anything.</p> <p>20 <b>Q. So that includes e-mails, texts, and any</b></p> <p>21 <b>other written communications?</b></p> <p>22 A. Yes.</p> <p>23 <b>Q. Number 11, any and all documents in your</b></p> <p>24 <b>possession that evidence or relate to a lead request</b></p>

<p style="text-align: right;">Page 125</p> <p>1 for auto insurance created on</p> <p>2 SnappyAutoInsurance.com in 2019 for or by Joe or</p> <p>3 Joseph Mantha. Do you see that?</p> <p>4 A. Yup.</p> <p>5 Q. And besides searching your e-mails, the two</p> <p>6 e-mails we discussed -- Strike that. When you</p> <p>7 searched your e-mails, how did you search, just by</p> <p>8 SnappyAutoInsurance or by other terms?</p> <p>9 A. SnappyAuto. Snappy -- I don't know. I</p> <p>10 just looked through the site, just however I read</p> <p>11 it. You drop the domain name and the subject line.</p> <p>12 There's nothing there.</p> <p>13 Q. Did you search for the plaintiff's name?</p> <p>14 A. Well, when I first got this, yeah, but</p> <p>15 that's not even on our database.</p> <p>16 Q. I'm just asking, did you search your</p> <p>17 e-mails for that name?</p> <p>18 A. Not my e-mail because I don't even know who</p> <p>19 that is. I never had correspondence with that</p> <p>20 person.</p> <p>21 Q. Besides searching your e-mails and I think</p> <p>22 you said you might have logged on to GoDaddy.com,</p> <p>23 what other steps did you take to look for the</p> <p>24 documents?</p>	<p style="text-align: right;">Page 127</p> <p>1 language on your websites?</p> <p>2 A. Of course. They're standard and whatever</p> <p>3 else needs to be added. Any site I have, just plug</p> <p>4 your phone number, which many don't. There's TCBA</p> <p>5 language that's usually provided by the person</p> <p>6 buying the leads.</p> <p>7 Q. And if there's not a client in place on the</p> <p>8 website's bill, who's coming up with that language?</p> <p>9 A. It's probably not on there until it starts</p> <p>10 to get traffic.</p> <p>11 Q. So you testified earlier that sometimes you</p> <p>12 build the website and then you generate leads to</p> <p>13 sell; is that accurate?</p> <p>14 A. Yes. So then it will be on there. But if</p> <p>15 the website's built and there's no leads being</p> <p>16 generated, it doesn't go on there until there's a</p> <p>17 reason to go on there. If it was generating leads,</p> <p>18 it means there's someone buying them on the back</p> <p>19 end, so I would get it from whoever I'm selling them</p> <p>20 to.</p> <p>21 Q. By the time you sell your first lead, that</p> <p>22 language would be on the website, correct?</p> <p>23 A. It might or it might not be. The website</p> <p>24 might be built just for the display just to show the</p>
<p style="text-align: right;">Page 126</p> <p>1 A. That's it. And I just don't have -- I</p> <p>2 didn't know where else it would be.</p> <p>3 Q. We mentioned Offervision earlier. Is the</p> <p>4 full name Offervision, one word, Media, LLC?</p> <p>5 A. I don't know how it's properly pronounced</p> <p>6 or -- Offervision, I know that, but I don't know how</p> <p>7 legally it is.</p> <p>8 Q. Do you know if SnappyAutoInsurance was</p> <p>9 generating leads in 2019?</p> <p>10 A. I have no clue.</p> <p>11 Q. So you have no personal knowledge about</p> <p>12 that?</p> <p>13 A. No. And I have no clue who this Fenix</p> <p>14 Media is. So I don't know. I'm not involved with</p> <p>15 it.</p> <p>16 Q. For the websites you have built, who came</p> <p>17 up with the opt-in language?</p> <p>18 A. Usually it comes from leads, from the</p> <p>19 people buying the leads or a company or someone's</p> <p>20 general counsel.</p> <p>21 Q. Do you know if there's an attorney</p> <p>22 associated with SnappyAutoInsurance.com?</p> <p>23 A. No clue.</p> <p>24 Q. And do you have standard TCBA consent</p>	<p style="text-align: right;">Page 128</p> <p>1 people, and then once we get someone to commit to</p> <p>2 any traffic, then we will add it and make the form</p> <p>3 work. If the website is up without it, then most</p> <p>4 likely the form would not work. It wouldn't go</p> <p>5 anywhere.</p> <p>6 Q. So what I take from your testimony is</p> <p>7 typically the TCBA consent language is driven by the</p> <p>8 client who's buying the leads; is that accurate?</p> <p>9 A. Accurate, yes, because they need their name</p> <p>10 and who's calling, et cetera, on the site to make it</p> <p>11 compliant, from what I know, so --</p> <p>12 Q. Have you ever heard of a company called</p> <p>13 Jornaya or Lead Intelligence, Inc.?</p> <p>14 A. Yes. Jornaya is a big company.</p> <p>15 Q. Do you use Jornaya on your lead aggregation</p> <p>16 websites?</p> <p>17 A. I just started to recently. I know more</p> <p>18 people are moving towards it, but that started</p> <p>19 within the past few months. That's a new thing</p> <p>20 we've been using.</p> <p>21 Q. Do you know if you were using it back in</p> <p>22 the 2013 time frame?</p> <p>23 A. Definitely not. Just started using it a</p> <p>24 few months ago.</p>



Page 129

1 Q. For any lead aggregation websites that  
2 you've built, how do you authenticate consumer  
3 information, the leads?

4 MR. BRODERICK: Objection.

5 A. It depends. Every site is different.  
6 Sometimes the user does it. His company is out  
7 there. It really depends. For this site, I have no  
8 clue how they do it.

9 Q. When you say the user does it, you mean  
10 that there's some type of verification on the --

11 A. Like Xverify or there's companies out there  
12 that you can pay monthly for it to verify if it's  
13 real information.

14 Q. Can you give me an idea of some of the  
15 companies that provide that type of service that  
16 you've used?

17 A. Xverify. That's the only one I've used.

18 Q. Okay. Do you pay a monthly fee?

19 A. Yes. I've done it before but just to test  
20 it, but it's expensive. Not everyone does it.

21 Q. Do you know if GoDaddy offers any type of  
22 verification services?

23 A. Not that I know of.

24 Q. Have you ever heard of a company called

Page 131

1 A. No.

2 Q. For your lead aggregation websites that  
3 you've built, have you built any for auto insurance?

4 A. Probably at some point.

5 Q. Excepting SnappyAutoInsurance, which is  
6 your testimony you don't recall, do you recall  
7 building any other auto insurance websites?

8 A. I've ran sites. I don't know -- I'm not  
9 running any now. I don't know. Throughout my  
10 years, I've probably built them. I build sites all  
11 the time but nothing currently.

12 Q. And when you say you've run websites, what  
13 do you mean by that?

14 A. Drove traffic to them.

15 Q. Have you ever had anything to do on the  
16 lead side in terms of buying and selling leads?

17 A. Yeah, sure.

18 Q. What about with auto insurance websites?

19 A. Yeah. I've bought and sold leads but  
20 not -- not recently.

21 Q. Do you recall any of the websites' names?

22 A. No.

23 Q. I'm going to show you what's been marked as  
24 Exhibit 16. Can you see that clearly?

Page 130

1 RevPoint?

2 A. RevPoint, no.

3 Q. What about Request Path Media?

4 A. No.

5 Q. Have you heard of a website called  
6 Unitedquotes.com?

7 A. No, I have not.

8 Q. What about Autoinsurequotes.com?

9 A. No.

10 Q. Are any of the Snappy websites still  
11 operational?

12 A. I have no clue.

13 Q. Do you know if any leads were ever sold  
14 from SnappyAutoInsurance.com?

15 A. No, I don't know.

16 Q. Would that be anywhere in your records?

17 A. They're not, no, because I looked through  
18 them. I don't see anything related to the site.

19 Q. I'm going to show you what's been  
20 pre-marked as Exhibit 15. So this is a subpoena  
21 response that was received from Plural Marketing.  
22 And this is the information they provided about  
23 Joseph Mantha's lead. Have you ever seen any of  
24 this information before?

Page 132

1 A. Now I can.

2 Q. So this is a subpoena response that was  
3 received from RevPoint Media in this case. Have you  
4 ever seen any of this information before?

5 A. No.

6 Q. Did you have enough time to look through  
7 it?

8 A. Yeah. I don't have any -- I don't even --  
9 I don't know it, once again, and I don't deal  
10 directly with RevPoint Media, so I don't know.

11 Q. Have you ever seen that address in the top  
12 left corner?

13 A. No.

14 Q. What about the phone number?

15 A. No.

16 Q. What about the e-mail?

17 A. No.

18 Q. Do you recognize that IP address?


19 A. No.

20 Q. And your testimony is that you did not  
21 enter this information on SnappyAutoInsurance.com;  
22 is that correct?

23 A. Correct.

24 Q. And you have no way of knowing or knowledge

<p style="text-align: right;">Page 133</p> <p>1 of whether someone did?</p> <p>2 A. No.</p> <p>3 Q. Just give me a moment. I only have a few</p> <p>4 more questions for you. When you spoke to Adam</p> <p>5 Brown about this case, did he mention your</p> <p>6 involvement in it?</p> <p>7 A. No. He said -- He said similar to me, "I</p> <p>8 don't remember. I've got to look into it." And</p> <p>9 then he thought it might have been sold. We didn't</p> <p>10 really discuss much more. Neither one of us from my</p> <p>11 knowledge has any information on the site. And he</p> <p>12 didn't have anything on his servers and I didn't</p> <p>13 have any on mine, so I don't know.</p> <p>14 Q. Did you mention that Blueflame's name is on</p> <p>15 the privacy policy?</p> <p>16 A. Yeah.</p> <p>17 Q. What did he say?</p> <p>18 A. "That's weird."</p> <p>19 Q. So he didn't know why Blueflame's name was</p> <p>20 on there?</p> <p>21 A. No. Like I said, this probably happened --</p> <p>22 probably pulled it from a different site and whoever</p> <p>23 was building it didn't do a find and replace,</p> <p>24 because most people don't put their company name on</p>	<p style="text-align: right;">Page 135</p> <p>1 I mean I didn't -- especially back then. I don't</p> <p>2 know.</p> <p>3 Q. And it's your testimony you don't remember</p> <p>4 paying for the Mailgun services in 2017?</p> <p>5 A. I've seen the two charges and I'm curious</p> <p>6 now what they are for and how they relate to this</p> <p>7 site, because in the e-mails, when I look on</p> <p>8 Mailgun, I do see what you showed me and I do see my</p> <p>9 credit card expired, but it does not show me any</p> <p>10 website name or anything. It shows me two different</p> <p>11 \$5 charges and change, but I don't know what they're</p> <p>12 for or what they're related to. So I don't know if</p> <p>13 e-mail would provide you more information on how</p> <p>14 it's related to the site. It doesn't even have a</p> <p>15 website name in the e-mails which I'll send to</p> <p>16 forward.</p> <p>17 Q. We'd appreciate that.</p> <p>18 MS. KINGSTON: So those are all the</p> <p>19 questions that I have. We do have the Blueflame</p> <p>20 keeper of the records deposition at 2. I don't</p> <p>21 expect that to take long. And by process of</p> <p>22 elimination, I assume that you're keeper of the</p> <p>23 records?</p> <p>24 THE WITNESS: Yup.</p>
<p style="text-align: right;">Page 134</p> <p>1 there if they are providing affiliates because that</p> <p>2 would take out the middle man.</p> <p>3 Q. Did he admit to you that he ran this</p> <p>4 website?</p> <p>5 A. He said he didn't remember, that he's going</p> <p>6 to look into it, the same thing I said.</p> <p>7 Q. And when was that conversation?</p> <p>8 A. When we first started getting information</p> <p>9 about this site.</p> <p>10 Q. And did he ever follow up with you after he</p> <p>11 said he'd check?</p> <p>12 A. Just that you guys sent him stuff and I</p> <p>13 said they're sending me stuff too. I don't know</p> <p>14 what to tell you guys. I don't have any</p> <p>15 information. It hasn't been talked about too much</p> <p>16 because we don't have anything to really give you.</p> <p>17 Q. You've mentioned affiliates. Were there</p> <p>18 certain affiliates you were working with in 2013?</p> <p>19 A. I couldn't even tell you. We've worked</p> <p>20 with hundreds and hundreds of affiliates throughout</p> <p>21 the years. I wouldn't be able to tell you.</p> <p>22 Q. Let me narrow that down. What about</p> <p>23 related to auto insurance?</p> <p>24 A. I couldn't tell you. I don't recall any.</p>	<p style="text-align: right;">Page 136</p> <p>1 (Discussion off the record.)</p> <p>2 MS. KINGSTON: Mr. Cohen, so those are</p> <p>3 all the questions we have for you. I would request</p> <p>4 that you send me the Mailgun e-mails that we spoke</p> <p>5 about earlier.</p> <p>6 THE WITNESS: Okay.</p> <p>7 MS. KINGSTON: I'd also request if --</p> <p>8 You couldn't recall if you had gone on to GoDaddy.</p> <p>9 I just request that you do that just to see in case</p> <p>10 you haven't and just get back to me if you see</p> <p>11 anything about Snappy.</p> <p>12 THE WITNESS: I did go on GoDaddy. I</p> <p>13 didn't see the site.</p> <p>14 MS. KINGSTON: Earlier you weren't</p> <p>15 sure if you did, but now you're saying --</p> <p>16 THE WITNESS: I wasn't sure -- I don't</p> <p>17 know what I said. I'm just saying I went into my</p> <p>18 accounts. I didn't see the site. I don't have the</p> <p>19 site. I mean it's clearly not registered to me. I</p> <p>20 see it in your thing, so I don't know what I'm</p> <p>21 looking for.</p> <p>22 MS. KINGSTON: So having heard that</p> <p>23 you went into that, that's fine. So we'll just ask</p> <p>24 for the Mailgun e-mails. So we are all set. We can</p>

<p style="text-align: right;">Page 137</p> <p>1 conclude this deposition.                  2 (Whereupon the deposition                  3 was concluded at 1:48 p.m.)                  4                  5                  6                  7                  8                  9                  10                  11                  12                  13                  14                  15                  16                  17                  18                  19                  20                  21                  22                  23                  24</p>	<p style="text-align: right;">Page 139</p> <p>1 COMMONWEALTH OF MASSACHUSETTS                  2 SUFFOLK, SS.                  3                  4 I, Karen A. Interbartolo, Registered                  5 Professional Reporter and Notary Public in and for                  6 the Commonwealth of Massachusetts, do hereby certify                  7 that JUSTIN COHEN, the witness whose deposition is                  8 hereinbefore set forth, was duly sworn by me and                  9 that such deposition is a true record of the                  10 testimony given by the witness.                  11                  12 I further certify that I am neither related to                  13 nor employed by any of the parties in or counsel to                  14 this action, nor am I financially interested in the                  15 outcome of this action.                  16                  17 In witness whereof, I have hereunto set my hand                  18 and seal this 4th day of October, 2020.                  19                  20                   21                  22 Notary Public                  23 My commission expires                  24 February 20, 2026</p>
<p style="text-align: right;">Page 138</p> <p>1 CERTIFICATE                  2                  3 I, JUSTIN COHEN, do hereby certify that I have                  4 read the foregoing transcript of my testimony, and                  5 further certify that said transcript is a true and                  6 accurate record of said testimony with the exception                  7 of the following corrections listed below:                  8 Page Line Correction/Reason                  9 _____                  10 _____                  11 _____                  12 _____                  13 _____                  14 _____                  15 _____                  16 _____                  17 _____                  18 _____                  19                  20 Signed under the pains and penalties of perjury                  21 this ____ day of _____, 2020.                  22                  23 _____                  24 JUSTIN COHEN</p>	

<b>Exhibits</b>	<b>Pre-Marked Exhibit 8 (Mailgun Technologies Subpoena Response E-mail Chain)</b> 4:4 89:2	4:13 130:20	<b>12</b> 40:6 54:14 112:19 124:15	134:18
<b>Pre-Marked Exhibit 1 (Cohen Subpoena)</b> 3:12 5:3 121:24	<b>Pre-Marked Exhibit 9 (Subpoena to GoDaddy)</b> 4:5 90:9	<b>Pre-Marked Exhibit 16 (RevPoint Subpoena Response)</b> 4:15 131:24	<b>13</b> 114:5	<b>2014</b> 50:4 60:18
<b>Pre-Marked Exhibit 2 (BlueFlame KOR Subpoena)</b> 3:13	<b>Pre-Marked Exhibit 10 (GoDaddy Subpoena Response)</b> 4:6 93:7 95:10	<b>Exhibit 17 Cohen Depo</b> 4:17 5:3 100:15,16,19	<b>14</b> 40:7 119:15	<b>2015</b> 11:3 16:4 54:12 60:13 67:20
<b>Pre-Marked Exhibit 3 (Snappy Lead Page Screenshot)</b> 3:15 75:10,14 115:19	<b>Pre-Marked Exhibit 11 (Adam Brown E-Mail Chain)</b> 4:8 110:1,3	<b>\$</b>	<b>15</b> 50:4 130:20	<b>2016</b> 59:18 60:18 92:10
<b>Pre-Marked Exhibit 4 (Snappy Screen shot Terms of Use)</b> 3:17 78:5,7	<b>Pre-Marked Exhibit 12 (Justin Cohen E-mail Chain)</b> 4:10 112:19	<b>\$1,000</b> 42:9	<b>16</b> 60:13 75:8 78:9 79:4 131:24	<b>2017</b> 70:21 85:5,9 86:21 89:18 135:4
<b>Pre-Marked Exhibit 5 (Snappy Screen shot Privacy Policy)</b> 3:19 79:1,3	<b>Pre-Marked Exhibit 13 (Sep. 2019 Email from Dario Osmancevic)</b> 4:11 114:5	<b>\$10</b> 29:7 30:21 41:8 48:3,6 83:13	<b>17</b> 5:3 86:24 95:10 100:16,19	<b>2018</b> 8:12 78:9 79:5 85:5 87:2
<b>Pre-Marked Exhibit 6 (Mailgun Technologies Subpoena)</b> 3:21 82:5	<b>Pre-Marked Exhibit 14 (July 28, 2020 Email from Dario Osmancevic)</b> 4:12 119:15	<b>\$11</b> 48:6	<b>19748</b> 59:7	<b>2019</b> 16:5,9 42:1 75:16 104:23 105:13 125:2 126:9
<b>Pre-Marked Exhibit 7 (Mailgun Technologies Subpoena Response)</b> 3:23 82:20 83:3	<b>Pre-Marked Exhibit 15 (Plural Marketing Subpoena Response)</b>	<b>\$12</b> 40:22 48:3	<b>1:03 p.m.</b> 99:12	<b>2020</b> 16:7 93:24 103:10 110:6 111:21 119:20 124:17
		<b>\$15</b> 40:22	<b>1:48 p.m.</b> 137:3	<b>21766</b> 60:1
		<b>\$5</b> 29:7 85:9 86:3 135:11	<b>2</b> 135:20	<b>24</b> 93:8,24 95:15
		<b>\$50</b> 29:7	<b>20</b> 22:6	<b>28</b> 119:20
		<b>\$500</b> 42:9	<b>2000</b> 54:17 62:10 65:11	<b>2:35</b> 101:1
		<b>\$9</b> 40:23 48:3	<b>2001</b> 54:17 65:12	<b>2:38</b> 101:3
		<b>1</b>	<b>2005</b> 28:18 40:11 50:12 55:4	<b>2nd</b> 100:21
		<b>1</b> 5:3 75:7 98:1, 13,14,16 99:5, 7,11 121:24	<b>2006</b> 60:7 61:17	<b>3</b> 75:10,14 115:19
		<b>10</b> 22:6 93:7 95:10	<b>2007</b> 60:6 92:10	<b>30</b> 5:12 50:20 110:6
		<b>1003</b> 83:23	<b>2008</b> 24:10 45:14 50:12 52:4 91:20,22	<b>302</b> 64:16 80:18
		<b>1099</b> 51:24 52:1	<b>2012</b> 54:12	<b>33428</b> 60:1
		<b>11</b> 110:1,3 124:23	<b>2013</b> 43:18 70:12 71:10,16 93:8 95:15 97:1 109:10 128:22	

<b>33498</b> 89:8	<b>ability</b> 7:15,18	56:19 57:12 58:20 61:7,11, 20 62:7,23 64:5 65:12 66:18 67:8 74:16,19 80:7, 23 91:10,12 95:14 96:3,24 97:15 99:15 102:4 103:9, 23 104:3,13 105:2 106:8, 11 110:4,6 114:22 116:10,18 122:6 133:4	<b>Advance</b> 49:24 <b>advertising</b> 32:5 <b>advice</b> 17:21 20:6 37:17 <b>affect</b> 7:15,18 <b>affiliate</b> 10:5 34:4,5,8, 11 35:20 37:12 41:14 42:3 46:12,20 47:4,6,13,24 48:7 50:7 55:16 57:21 80:14 <b>affiliated</b> 36:11,13,14, 18 39:4 46:8 48:19 56:21, 23 62:20 <b>affiliates</b> 34:9,14 37:10 40:23 48:14, 15 49:1 54:6 134:1,17,18, 20 <b>agent</b> 24:6 <b>aggregating</b> 43:6 <b>aggregation</b> 40:5 44:16 56:1 57:24 69:3 71:1 80:13 121:12 128:15 129:1 131:2 <b>aggregator</b> 28:23,24 29:11 30:6 31:8 <b>aggregators</b> 31:5 <b>agree</b> 27:23 36:12 101:7 <b>agreed</b> 41:8 101:15 <b>agreeing</b> 27:24	<b>ahead</b> 109:6 <b>America</b> 50:1 <b>American</b> 83:22 84:3 <b>amount</b> 24:6 41:12 83:13 85:9 <b>Ann</b> 53:15 60:10 <b>announcing</b> 15:6 <b>answers</b> 6:14 13:2 124:6 <b>anymore</b> 8:14 10:15,16 15:21 16:23 17:1 41:6 110:9 111:21 <b>anyone's</b> 105:12,14 115:16 <b>apartment</b> 65:3,13,14 <b>API</b> 44:14 <b>APIS</b> 43:12,20 44:5 <b>application</b> 119:24 <b>approximate</b> 73:15 <b>approximately</b> 55:3 60:18 <b>April</b> 49:12 <b>Arbor</b> 64:16,20 80:18 <b>area</b> 23:6 33:14 <b>article</b> 15:4 <b>asks</b> 115:22 <b>assigned</b> 56:18 <b>assume</b> 6:11 28:22 31:11 48:17
<b>4</b> <hr/> <b>4</b> 78:5,7	<b>access</b> 16:5,8 40:2 68:15,18 80:17 <b>accessed</b> 14:14 <b>accommodate</b> 6:18 97:24 <b>account</b> 32:15 33:4 66:9 89:15,17 91:23 94:6 119:6 <b>accounts</b> 32:24 107:12 136:18 <b>accurate</b> 30:1,6 39:15, 19 43:4 48:9 50:17 51:11 58:16 61:16 65:19 105:4,5 111:8,13 113:21 127:13 128:8,9 <b>accurately</b> 7:15,18 <b>accused</b> 106:11 <b>acquisition</b> 15:6 <b>active</b> 22:6,9,11 23:8 32:23 45:16 46:7 51:18 94:2,5,9,14 <b>actual</b> 68:12 <b>ad</b> 32:23 35:18 <b>Adam</b> 8:8 9:1,18 10:2 11:6,15, 17,24 13:17, 23 15:9,14 17:7,10 34:8 38:10 42:13 43:10 45:5,7 46:15,21,24 47:2 53:19 54:3 55:13	<b>Adam's</b> 57:8 101:5 <b>adamb1140@</b> <b>gmail</b> 8:24 <b>Adamb11480</b> <b>@gmail.com</b> 101:3 <b>Adamb11480</b> <b>@gmail.com.</b> 93:6 <b>add</b> 128:2 <b>added</b> 48:10 127:3 <b>addition</b> 62:13 109:2 <b>additional</b> 53:11 117:3 <b>address</b> 59:6,21 60:19 64:15,17 67:21 68:9 80:18 81:2 83:8 84:8,9, 17,18,24 92:7, 8,22 108:20 116:14 117:8 132:11,18 <b>addresses</b> 65:14 81:4 109:17 <b>admit</b> 134:3 <b>ads</b> 25:10 26:11 50:18	<b>Advances</b> 49:24 <b>advertising</b> 32:5 <b>advice</b> 17:21 20:6 37:17 <b>affect</b> 7:15,18 <b>affiliate</b> 10:5 34:4,5,8, 11 35:20 37:12 41:14 42:3 46:12,20 47:4,6,13,24 48:7 50:7 55:16 57:21 80:14 <b>affiliated</b> 36:11,13,14, 18 39:4 46:8 48:19 56:21, 23 62:20 <b>affiliates</b> 34:9,14 37:10 40:23 48:14, 15 49:1 54:6 134:1,17,18, 20 <b>agent</b> 24:6 <b>aggregating</b> 43:6 <b>aggregation</b> 40:5 44:16 56:1 57:24 69:3 71:1 80:13 121:12 128:15 129:1 131:2 <b>aggregator</b> 28:23,24 29:11 30:6 31:8 <b>aggregators</b> 31:5 <b>agree</b> 27:23 36:12 101:7 <b>agreed</b> 41:8 101:15 <b>agreeing</b> 27:24	<b>ahead</b> 109:6 <b>America</b> 50:1 <b>American</b> 83:22 84:3 <b>amount</b> 24:6 41:12 83:13 85:9 <b>Ann</b> 53:15 60:10 <b>announcing</b> 15:6 <b>answers</b> 6:14 13:2 124:6 <b>anymore</b> 8:14 10:15,16 15:21 16:23 17:1 41:6 110:9 111:21 <b>anyone's</b> 105:12,14 115:16 <b>apartment</b> 65:3,13,14 <b>API</b> 44:14 <b>APIS</b> 43:12,20 44:5 <b>application</b> 119:24 <b>approximate</b> 73:15 <b>approximately</b> 55:3 60:18 <b>April</b> 49:12 <b>Arbor</b> 64:16,20 80:18 <b>area</b> 23:6 33:14 <b>article</b> 15:4 <b>asks</b> 115:22 <b>assigned</b> 56:18 <b>assume</b> 6:11 28:22 31:11 48:17
<b>5</b> <hr/> <b>5</b> 61:18 79:1,3 <b>50</b> 11:22 30:11 <b>500</b> 50:1 <b>561-573-9083</b> 84:12	<b>ability</b> 7:15,18 <b>access</b> 16:5,8 40:2 68:15,18 80:17 <b>accessed</b> 14:14 <b>accommodate</b> 6:18 97:24 <b>account</b> 32:15 33:4 66:9 89:15,17 91:23 94:6 119:6 <b>accounts</b> 32:24 107:12 136:18 <b>accurate</b> 30:1,6 39:15, 19 43:4 48:9 50:17 51:11 58:16 61:16 65:19 105:4,5 111:8,13 113:21 127:13 128:8,9 <b>accurately</b> 7:15,18 <b>accused</b> 106:11 <b>acquisition</b> 15:6 <b>active</b> 22:6,9,11 23:8 32:23 45:16 46:7 51:18 94:2,5,9,14 <b>actual</b> 68:12 <b>ad</b> 32:23 35:18 <b>Adam</b> 8:8 9:1,18 10:2 11:6,15, 17,24 13:17, 23 15:9,14 17:7,10 34:8 38:10 42:13 43:10 45:5,7 46:15,21,24 47:2 53:19 54:3 55:13	<b>Adam's</b> 57:8 101:5 <b>adamb1140@</b> <b>gmail</b> 8:24 <b>Adamb11480</b> <b>@gmail.com</b> 101:3 <b>Adamb11480</b> <b>@gmail.com.</b> 93:6 <b>add</b> 128:2 <b>added</b> 48:10 127:3 <b>addition</b> 62:13 109:2 <b>additional</b> 53:11 117:3 <b>address</b> 59:6,21 60:19 64:15,17 67:21 68:9 80:18 81:2 83:8 84:8,9, 17,18,24 92:7, 8,22 108:20 116:14 117:8 132:11,18 <b>addresses</b> 65:14 81:4 109:17 <b>admit</b> 134:3 <b>ads</b> 25:10 26:11 50:18	<b>Advances</b> 49:24 <b>advertising</b> 32:5 <b>advice</b> 17:21 20:6 37:17 <b>affect</b> 7:15,18 <b>affiliate</b> 10:5 34:4,5,8, 11 35:20 37:12 41:14 42:3 46:12,20 47:4,6,13,24 48:7 50:7 55:16 57:21 80:14 <b>affiliated</b> 36:11,13,14, 18 39:4 46:8 48:19 56:21, 23 62:20 <b>affiliates</b> 34:9,14 37:10 40:23 48:14, 15 49:1 54:6 134:1,17,18, 20 <b>agent</b> 24:6 <b>aggregating</b> 43:6 <b>aggregation</b> 40:5 44:16 56:1 57:24 69:3 71:1 80:13 121:12 128:15 129:1 131:2 <b>aggregator</b> 28:23,24 29:11 30:6 31:8 <b>aggregators</b> 31:5 <b>agree</b> 27:23 36:12 101:7 <b>agreed</b> 41:8 101:15 <b>agreeing</b> 27:24	<b>ahead</b> 109:6 <b>America</b> 50:1 <b>American</b> 83:22 84:3 <b>amount</b> 24:6 41:12 83:13 85:9 <b>Ann</b> 53:15 60:10 <b>announcing</b> 15:6 <b>answers</b> 6:14 13:2 124:6 <b>anymore</b> 8:14 10:15,16 15:21 16:23 17:1 41:6 110:9 111:21 <b>anyone's</b> 105:12,14 115:16 <b>apartment</b> 65:3,13,14 <b>API</b> 44:14 <b>APIS</b> 43:12,20 44:5 <b>application</b> 119:24 <b>approximate</b> 73:15 <b>approximately</b> 55:3 60:18 <b>April</b> 49:12 <b>Arbor</b> 64:16,20 80:18 <b>area</b> 23:6 33:14 <b>article</b> 15:4 <b>asks</b> 115:22 <b>assigned</b> 56:18 <b>assume</b> 6:11 28:22 31:11 48:17
<b>6</b> <hr/> <b>6</b> 75:16 82:5	<b>ability</b> 7:15,18 <b>access</b> 16:5,8 40:2 68:15,18 80:17 <b>accessed</b> 14:14 <b>accommodate</b> 6:18 97:24 <b>account</b> 32:15 33:4 66:9 89:15,17 91:23 94:6 119:6 <b>accounts</b> 32:24 107:12 136:18 <b>accurate</b> 30:1,6 39:15, 19 43:4 48:9 50:17 51:11 58:16 61:16 65:19 105:4,5 111:8,13 113:21 127:13 128:8,9 <b>accurately</b> 7:15,18 <b>accused</b> 106:11 <b>acquisition</b> 15:6 <b>active</b> 22:6,9,11 23:8 32:23 45:16 46:7 51:18 94:2,5,9,14 <b>actual</b> 68:12 <b>ad</b> 32:23 35:18 <b>Adam</b> 8:8 9:1,18 10:2 11:6,15, 17,24 13:17, 23 15:9,14 17:7,10 34:8 38:10 42:13 43:10 45:5,7 46:15,21,24 47:2 53:19 54:3 55:13	<b>Adam's</b> 57:8 101:5 <b>adamb1140@</b> <b>gmail</b> 8:24 <b>Adamb11480</b> <b>@gmail.com</b> 101:3 <b>Adamb11480</b> <b>@gmail.com.</b> 93:6 <b>add</b> 128:2 <b>added</b> 48:10 127:3 <b>addition</b> 62:13 109:2 <b>additional</b> 53:11 117:3 <b>address</b> 59:6,21 60:19 64:15,17 67:21 68:9 80:18 81:2 83:8 84:8,9, 17,18,24 92:7, 8,22 108:20 116:14 117:8 132:11,18 <b>addresses</b> 65:14 81:4 109:17 <b>admit</b> 134:3 <b>ads</b> 25:10 26:11 50:18	<b>Advances</b> 49:24 <b>advertising</b> 32:5 <b>advice</b> 17:21 20:6 37:17 <b>affect</b> 7:15,18 <b>affiliate</b> 10:5 34:4,5,8, 11 35:20 37:12 41:14 42:3 46:12,20 47:4,6,13,24 48:7 50:7 55:16 57:21 80:14 <b>affiliated</b> 36:11,13,14, 18 39:4 46:8 48:19 56:21, 23 62:20 <b>affiliates</b> 34:9,14 37:10 40:23 48:14, 15 49:1 54:6 134:1,17,18, 20 <b>agent</b> 24:6 <b>aggregating</b> 43:6 <b>aggregation</b> 40:5 44:16 56:1 57:24 69:3 71:1 80:13 121:12 128:15 129:1 131:2 <b>aggregator</b> 28:23,24 29:11 30:6 31:8 <b>aggregators</b> 31:5 <b>agree</b> 27:23 36:12 101:7 <b>agreed</b> 41:8 101:15 <b>agreeing</b> 27:24	<b>ahead</b> 109:6 <b>America</b> 50:1 <b>American</b> 83:22 84:3 <b>amount</b> 24:6 41:12 83:13 85:9 <b>Ann</b> 53:15 60:10 <b>announcing</b> 15:6 <b>answers</b> 6:14 13:2 124:6 <b>anymore</b> 8:14 10:15,16 15:21 16:23 17:1 41:6 110:9 111:21 <b>anyone's</b> 105:12,14 115:16 <b>apartment</b> 65:3,13,14 <b>API</b> 44:14 <b>APIS</b> 43:12,20 44:5 <b>application</b> 119:24 <b>approximate</b> 73:15 <b>approximately</b> 55:3 60:18 <b>April</b> 49:12 <b>Arbor</b> 64:16,20 80:18 <b>area</b> 23:6 33:14 <b>article</b> 15:4 <b>asks</b> 115:22 <b>assigned</b> 56:18 <b>assume</b> 6:11 28:22 31:11 48:17
<b>7</b> <hr/> <b>7</b> 68:14 82:20 83:3	<b>ability</b> 7:15,18 <b>access</b> 16:5,8 40:2 68:15,18 80:17 <b>accessed</b> 14:14 <b>accommodate</b> 6:18 97:24 <b>account</b> 32:15 33:4 66:9 89:15,17 91:23 94:6 119:6 <b>accounts</b> 32:24 107:12 136:18 <b>accurate</b> 30:1,6 39:15, 19 43:4 48:9 50:17 51:11 58:16 61:16 65:19 105:4,5 111:8,13 113:21 127:13 128:8,9 <b>accurately</b> 7:15,18 <b>accused</b> 106:11 <b>acquisition</b> 15:6 <b>active</b> 22:6,9,11 23:8 32:23 45:16 46:7 51:18 94:2,5,9,14 <b>actual</b> 68:12 <b>ad</b> 32:23 35:18 <b>Adam</b> 8:8 9:1,18 10:2 11:6,15, 17,24 13:17, 23 15:9,14 17:7,10 34:8 38:10 42:13 43:10 45:5,7 46:15,21,24 47:2 53:19 54:3 55:13	<b>Adam's</b> 57:8 101:5 <b>adamb1140@</b> <b>gmail</b> 8:24 <b>Adamb11480</b> <b>@gmail.com</b> 101:3 <b>Adamb11480</b> <b>@gmail.com.</b> 93:6 <b>add</b> 128:2 <b>added</b> 48:10 127:3 <b>addition</b> 62:13 109:2 <b>additional</b> 53:11 117:3 <b>address</b> 59:6,21 60:19 64:15,17 67:21 68:9 80:18 81:2 83:8 84:8,9, 17,18,24 92:7, 8,22 108:20 116:14 117:8 132:11,18 <b>addresses</b> 65:14 81:4 109:17 <b>admit</b> 134:3 <b>ads</b> 25:10 26:11 50:18	<b>Advances</b> 49:24 <b>advertising</b> 32:5 <b>advice</b> 17:21 20:6 37:17 <b>affect</b> 7:15,18 <b>affiliate</b> 10:5 34:4,5,8, 11 35:20 37:12 41:14 42:3 46:12,20 47:4,6,13,24 48:7 50:7 55:16 57:21 80:14 <b>affiliated</b> 36:11,13,14, 18 39:4 46:8 48:19 56:21, 23 62:20 <b>affiliates</b> 34:9,14 37:10 40:23 48:14, 15 49:1 54:6 134:1,17,18, 20 <b>agent</b> 24:6 <b>aggregating</b> 43:6 <b>aggregation</b> 40:5 44:16 56:1 57:24 69:3 71:1 80:13 121:12 128:15 129:1 131:2 <b>aggregator</b> 28:23,24 29:11 30:6 31:8 <b>aggregators</b> 31:5 <b>agree</b> 27:23 36:12 101:7 <b>agreed</b> 41:8 101:15 <b>agreeing</b> 27:24	<b>ahead</b> 109:6 <b>America</b> 50:1 <b>American</b> 83:22 84:3 <b>amount</b> 24:6 41:12 83:13 85:9 <b>Ann</b> 53:15 60:10 <b>announcing</b> 15:6 <b>answers</b> 6:14 13:2 124:6 <b>anymore</b> 8:14 10:15,16 15:21 16:23 17:1 41:6 110:9 111:21 <b>anyone's</b> 105:12,14 115:16 <b>apartment</b> 65:3,13,14 <b>API</b> 44:14 <b>APIS</b> 43:12,20 44:5 <b>application</b> 119:24 <b>approximate</b> 73:15 <b>approximately</b> 55:3 60:18 <b>April</b> 49:12 <b>Arbor</b> 64:16,20 80:18 <b>area</b> 23:6 33:14 <b>article</b> 15:4 <b>asks</b> 115:22 <b>assigned</b> 56:18 <b>assume</b> 6:11 28:22 31:11 48:17
<b>8</b> <hr/> <b>8</b> 89:2 <b>888</b> 78:1 <b>8th</b> 112:24	<b>ability</b> 7:15,18 <b>access</b> 16:5,8 40:2 68:15,18 80:17 <b>accessed</b> 14:14 <b>accommodate</b> 6:18 97:24 <b>account</b> 32:15 33:4 66:9 89:15,17 91:23 94:6 119:6 <b>accounts</b> 32:24 107:12 136:18 <b>accurate</b> 30:1,6 39:15, 19 43:4 48:9 50:17 51:11 58:16 61:16 65:19 105:4,5 111:8,13 113:21 127:13 128:8,9 <b>accurately</b> 7:15,18 <b>accused</b> 106:11 <b>acquisition</b> 15:6 <b>active</b> 22:6,9,11 23:8 32:23 45:16 46:7 51:18 94:2,5,9,14 <b>actual</b> 68:12 <b>ad</b> 32:23 35:18 <b>Adam</b> 8:8 9:1,18 10:2 11:6,15, 17,24 13:17, 23 15:9,14 17:7,10 34:8 38:10 42:13 43:10 45:5,7 46:15,21,24 47:2 53:19 54:3 55:13	<b>Adam's</b> 57:8 101:5 <b>adamb1140@</b> <b>gmail</b> 8:24 <b>Adamb11480</b> <b>@gmail.com</b> 101:3 <b>Adamb11480</b> <b>@gmail.com.</b> 93:6 <b>add</b> 128:2 <b>added</b> 48:10 127:3 <b>addition</b> 62:13 109:2 <b>additional</b> 53:11 117:3 <b>address</b> 59:6,21 60:19 64:15,17 67:21 68:9 80:18 81:2 83:8 84:8,9, 17,18,24 92:7, 8,22 108:20 116:14 117:8 132:11,18 <b>addresses</b> 65:14 81:4 109:17 <b>admit</b> 134:3 <b>ads</b> 25:10 26:11 50:18	<b>Advances</b> 49:24 <b>advertising</b> 32:5 <b>advice</b> 17:21 20:6 37:17 <b>affect</b> 7:15,18 <b>affiliate</b> 10:5 34:4,5,8, 11 35:20 37:12 41:14 42:3 46:12,20 47:4,6,13,24 48:7 50:7 55:16 57:21 80:14 <b>affiliated</b> 36:11,13,14, 18 39:4 46:8 48:19 56:21, 23 62:20 <b>affiliates</b> 34:9,14 37:10 40:23 48:14, 15 49:1 54:6 134:1,17,18, 20 <b>agent</b> 24:6 <b>aggregating</b> 43:6 <b>aggregation</b> 40:5 44:16 56:1 57:24 69:3 71:1 80:13 121:12 128:15 129:1 131:2 <b>aggregator</b> 28:23,24 29:11 30:6 31:8 <b>aggregators</b> 31:5 <b>agree</b> 27:23 36:12 101:7 <b>agreed</b> 41:8 101:15 <b>agreeing</b> 27:24	<b>ahead</b> 109:6 <b>America</b> 50:1 <b>American</b> 83:22 84:3 <b>amount</b> 24:6 41:12 83:13 85:9 <b>Ann</b> 53:15 60:10 <b>announcing</b> 15:6 <b>answers</b> 6:14 13:2 124:6 <b>anymore</b> 8:14 10:15,16 15:21 16:23 17:1 41:6 110:9 111:21 <b>anyone's</b> 105:12,14 115:16 <b>apartment</b> 65:3,13,14 <b>API</b> 44:14 <b>APIS</b> 43:12,20 44:5 <b>application</b> 119:24 <b>approximate</b> 73:15 <b>approximately</b> 55:3 60:18 <b>April</b> 49:12 <b>Arbor</b> 64:16,20 80:18 <b>area</b> 23:6 33:14 <b>article</b> 15:4 <b>asks</b> 115:22 <b>assigned</b> 56:18 <b>assume</b> 6:11 28:22 31:11 48:17
<b>9</b> <hr/> <b>9</b> 90:9 <b>90</b> 53:4 <b>9691</b> 64:15 80:18	<b>ability</b> 7:15,18 <b>access</b> 16:5,8 40:2 68:15,18 80:17 <b>accessed</b> 14:14 <b>accommodate</b> 6:18 97:24 <b>account</b> 32:15 33:4 66:9 89:15,17 91:23 94:6 119:6 <b>accounts</b> 32:24 107:12 136:18 <b>accurate</b> 30:1,6 39:15, 19 43:4 48:9 50:17 51:11 58:16 61:16 65:19 105:4,5 111:8,13 113:21 127:13 128:8,9 <b>accurately</b> 7:15,18 <b>accused</b> 106:11 <b>acquisition</b> 15:6 <b>active</b> 22:6,9,11 23:8 32:23 45:16 46:7 51:18 94:2,5,9,14 <b>actual</b> 68:12 <b>ad</b> 32:23 35:18 <b>Adam</b> 8:8 9:1,18 10:2 11:6,15, 17,24 13:17, 23 15:9,14 17:7,10 34:8 38:10 42:13 43:1			



135:22		<b>bid</b>	<b>Boca</b>	55:13 66:18
<b>assuming</b>	<b>B</b>	29:8,15,24	59:5,21 60:1	80:23
58:19 121:2		<b>bidder</b>	64:16 68:1	<b>browse</b>
<b>assumption</b>	<b>back</b>	24:8 28:23	80:19	13:11
39:19	37:21,24 40:1,	30:22	<b>booked</b>	<b>browsed</b>
<b>attached</b>	16,24 41:4,14	<b>bidders</b>	13:22	13:2
90:21	43:9 44:24	29:12 30:17	<b>bought</b>	<b>build</b>
<b>attorney</b>	45:12 50:4,20	<b>bids</b>	41:7 61:8,17	9:11 23:5,20,
17:15 82:6	51:4 52:7,16	29:6	83:12 121:14	21,22 37:8,17
123:3,22	58:2 60:23	<b>big</b>	131:19	40:15,19
126:21	61:21 62:1	26:2 30:12	<b>bounce</b>	44:17,21
<b>attorneys</b>	75:6 81:4	128:14	62:16	75:19 77:6,13
17:16,20	98:1,14 99:7,	<b>bill</b>	<b>break</b>	117:18 121:15
18:18,22 19:1,	10,13 101:11,	86:13 96:23	6:17 32:3	127:12 131:10
9 89:3,5 90:12	13 109:1	127:8	74:24 75:4	<b>building</b>
105:7 110:5	113:24 115:14	<b>billable</b>	97:19,23	9:8 40:11
112:6,24	118:14,18	89:18	98:13 99:20	68:11 77:8
<b>attorneys'</b>	120:17 127:18	<b>billing</b>	<b>BRODERICK</b>	121:3 124:8
17:18	128:21 135:1	82:16 85:6	5:8,15 30:2	131:7 133:23
<b>audible</b>	136:10	90:15	31:10,22	<b>built</b>
6:14	<b>bad</b>	<b>bills</b>	33:23 34:3,22	9:18 37:23
<b>August</b>	74:7	87:1 88:15,16	35:11,16 36:2	40:4,6,10 45:3
78:9 79:4	<b>banner</b>	<b>bit</b>	37:5 64:9,13	47:14 51:14
<b>authenticate</b>	34:16,17	32:4 36:6 50:2	71:22 72:6	75:21 77:16
129:2	<b>based</b>	60:23 61:8,19	76:10,13,15	81:7 116:6,12,
<b>auto</b>	23:5,18 45:9	<b>Blue</b>	78:11 90:19,	15 126:16
11:8,20,22	68:21 88:10	18:16	24 95:3 96:1,6	127:15,24
23:7,10,13	116:22	<b>Blueflame</b>	104:18 117:13	129:2 131:3,
25:14,16 26:4,	<b>basic</b>	21:6,10,15,17,	121:5 129:4	10
9 29:4 35:5	6:6 77:14	24 22:22	<b>brought</b>	<b>bunch</b>
58:8 70:7	<b>basically</b>	45:12,13,19	45:24 52:2	9:19 22:3 49:2
76:18 97:3	15:19 17:21	46:2,8,11,12,	<b>Brown</b>	<b>business</b>
125:1 131:3,7,	27:24 29:3	17,18,22	8:8 11:15,17	10:6 22:24
18 134:23	31:2 35:18	47:14,16,23	13:17 15:9,15	24:1 25:22
<b>Autoinsurance</b>	36:16 37:23	48:19 51:15,	16:16 17:10	47:11,15
<b>.com</b>	43:22 48:1,7	22 53:10,19	45:5,7 47:2	54:18,23 55:1
97:10	50:18 53:6	55:8 64:8,10,	53:19 54:3	62:14,18,21
<b>Autoinsurequo</b>	56:11 95:1	11 66:17 70:8	62:8,23 64:5	63:11,12
<b>tes.com</b>	112:9	73:23 79:12,	74:19 80:7	109:15,18,21
130:8	<b>basing</b>	15 135:19	87:20 91:10,	<b>businesses</b>
<b>automatically</b>	91:15	<b>Blueflame's</b>	13 95:14 96:3,	23:4 33:16
96:23 97:4	<b>Bear</b>	70:6 80:3	24 97:15	53:7 62:3,18
<b>aware</b>	60:1	133:14,19	99:15 100:20	<b>buy</b>
20:9,17 56:20	<b>beginning</b>	<b>Blueflamelab</b>	102:4 103:9	25:1,2,4,9,10
66:21 72:11,	19:14 52:23	<b>@gmail.com</b>	104:3 105:2	26:21 28:8
21 73:22	53:13 73:7	85:4	106:8,11	29:9 30:13,20
103:10,14	74:16 113:1	<b>Blueflameweb</b>	110:4,6 112:2	55:23 56:11
104:20,23	<b>believed</b>	<b>@gmail.com</b>	114:23 115:1	60:5 63:4,16
119:8	14:6	84:8 109:14	116:18 120:12	69:6 83:15
	<b>bell</b>	<b>Blueflameweb</b>	122:6,15	96:20,21
	65:21 66:2	<b>@gmail.com.</b>	133:5	107:10 121:8
	<b>Berger</b>	108:19	<b>Brown's</b>	<b>buyers</b>
	18:12		10:2 46:24	42:10 50:20

<b>buying</b> 26:19 43:7 48:6 77:21 78:2 126:19 127:6,18 128:8 131:16	122:3,15 123:23 132:3 133:5 136:9	48:12 52:24 53:3,4	<b>combined</b> 9:20	120:21 126:19 128:12,14 129:6,24 133:24
<b>buys</b> 29:7	<b>cc'd</b> 122:21	<b>clone</b> 74:3	<b>comdomainna meregistration</b> 96:12	<b>competitive</b> 33:17
<hr/> <b>C</b> <hr/>	<b>cell</b> 84:15 93:1	<b>closed</b> 89:16	<b>commit</b> 128:1	<b>compiled</b> 20:20
<b>call</b> 27:10,11,22 77:23 88:14 97:23 102:20 116:23	<b>cetera</b> 27:7 32:6 42:10 43:7 63:16 128:10	<b>closely</b> 11:6,23	<b>common</b> 74:1	<b>complete</b> 98:21,22 99:6, 7
<b>called</b> 10:2 18:4,14 19:8 21:5 56:24 68:4,5, 7,8 82:6,9 102:15 128:12 129:24 130:5	<b>chain</b> 48:9 73:19	<b>closing</b> 113:4	<b>communicated</b> 123:15	<b>completely</b> 7:9
<b>calling</b> 28:1 120:7 128:10	<b>change</b> 79:18 81:19 135:11	<b>Cloud</b> 41:17,22,23 66:11,13	<b>communicatio ns</b> 122:6,12,23 123:5,13 124:21	<b>compliant</b> 128:11
<b>calls</b> 19:3,6,13 98:18 99:6 120:1	<b>changed</b> 68:6 84:6	<b>clue</b> 10:21 18:1 26:1 35:21 45:11 58:10 61:13 68:23 71:12 77:21 78:20 80:8 82:1 92:20 114:12,16,24 120:3 126:10, 13,23 129:8 130:12	<b>companies</b> 11:8 21:7,9,23 23:3 26:9,23 28:4,7,10,12, 19 29:3 30:9, 20 42:7 45:15, 21 46:4,9 47:8 48:2,20,23 49:2,4 50:8 51:10 53:1,23, 24 55:24 62:24 67:18 69:23 77:1 80:11 117:21 119:4 129:11, 15	<b>comply</b> 124:1
<b>cancel</b> 42:11 95:5,6 96:22	<b>charge</b> 97:2	<b>code</b> 44:10 89:7,8 115:5 116:7, 24 118:6,14, 18,21	<b>companies'</b> 39:3	<b>concerned</b> 16:17
<b>captioning</b> 8:13	<b>charges</b> 135:5,11	<b>Cohen</b> 5:17 6:1 7:3 53:17 60:10 75:9 76:16 89:11 91:3 99:13 136:2	<b>company</b> 8:9,15 9:2,23 10:2,6 14:7,18 15:6 18:4,14 21:4,5 24:7 26:7 27:5,16, 22 28:6 29:15, 17 30:7,12 31:1,2 44:6,11 45:20 46:21, 23,24 47:9,14 49:5,11,16,18, 23 51:16,20 53:18 55:13, 15 57:8,17 62:5 79:19 80:1,2,12 82:6,9 83:10, 18 118:23	<b>conclude</b> 137:1
<b>car</b> 29:9	<b>charging</b> 86:3	<b>collab</b> 74:16		<b>concluded</b> 137:3
<b>card</b> 83:8 84:1,4 85:6 87:2 88:18 89:8,11, 16 97:3 135:9	<b>cheaper</b> 96:22	<b>collaborate</b> 12:1 87:22		<b>conditions</b> 7:17 34:7
<b>cards</b> 84:3	<b>cheapest</b> 70:4	<b>collect</b> 115:4,5,7,16 116:13 117:6		<b>confirmed</b> 16:20
<b>Carolina</b> 60:23	<b>check</b> 134:11	<b>collected</b> 116:21 117:9, 12,23		<b>confused</b> 26:3
<b>case</b> 6:3 18:17 20:4 41:5 72:8 89:4 98:24 100:11, 12 105:17 110:5 112:24 114:18 118:13	<b>checked</b> 94:5 107:3	<b>collecting</b> 116:16		<b>confusing</b> 28:9
	<b>checking</b> 73:9	<b>college</b> 65:12		<b>connected</b> 25:24
	<b>choose</b> 25:17	<b>column</b> 84:12		<b>connection</b> 6:22 62:21 85:16
	<b>Christine</b> 6:2 90:19			<b>consent</b> 126:24 128:7
	<b>clear</b> 38:5,7 98:2			<b>consultant</b> 49:7 53:20 54:4 63:7,10
	<b>click</b> 34:17 76:13			<b>consultants</b> 52:2
	<b>client</b> 23:17 24:5 43:23 44:18 63:17 127:7 128:8			<b>consulting</b> 21:8,18,22 22:24 32:2 51:12,16
	<b>client's</b> 23:6			<b>consumer</b> 24:2 35:9 118:20 129:2
	<b>clients</b> 21:19 40:17 44:12,20 45:3			<b>consumer's</b> 117:7

<b>contact</b> 67:7 82:15 90:15 99:14, 17	90:6 92:10,14 94:3 95:24 101:5,6 102:21 103:20 107:14 108:7, 8,10 111:19 113:7 116:2,3, 17 118:17 127:22 132:22,23	<b>curious</b> 135:5	<b>December</b> 41:24 42:1	80:2 118:4,8 132:10
<b>contacting</b> 15:24	<b>correctly</b> 35:8	<b>current</b> 59:24	<b>decent</b> 43:16	<b>Dirty</b> 101:2
<b>contacts</b> 57:7	<b>correspondenc e</b> 107:5 108:21 125:19	<b>custom</b> 23:20	<b>decided</b> 51:14 54:8	<b>disagree</b> 86:17 89:23
<b>context</b> 34:12 69:16	<b>cost</b> 48:11	<b>cut</b> 80:15	<b>defendant</b> 6:3	<b>discuss</b> 18:17 100:8 133:10
<b>contract</b> 27:1,3 29:16, 18,24 30:10 31:8 48:18 121:20	<b>costs</b> 21:22	<hr/> <b>D</b> <hr/>	<b>definition</b> 29:1	<b>discussed</b> 125:6
<b>contracts</b> 26:22 29:12, 13 48:16	<b>counsel</b> 17:13 19:4 126:20	<b>daily</b> 13:23	<b>delete</b> 17:1	<b>discussion</b> 136:1
<b>control</b> 28:6 30:11 39:7 72:18 112:14	<b>couple</b> 6:6 14:11,21 15:11 17:10 40:5 42:5 48:5 74:22	<b>Dana</b> 17:19 59:13	<b>deleted</b> 33:1,6 39:7	<b>display</b> 26:9 127:24
<b>conversation</b> 14:10 15:11 102:12 134:7	<b>court</b> 39:9 60:1 82:24 98:24	<b>Dario</b> 18:9 114:8,10 119:19 120:13	<b>delivered</b> 12:24	<b>district</b> 82:24
<b>conversations</b> 15:8,14 112:5	<b>cover</b> 97:20	<b>data</b> 38:21 42:11 55:17,21,22, 23 56:12 57:21 63:3,15 66:11 115:10 117:17,19,21 118:3 121:10	<b>department</b> 51:3	<b>document</b> 20:8,17 91:22 95:19,21 122:4
<b>coordinate</b> 101:12	<b>create</b> 11:19,24 70:1 78:17 79:8,13 105:17 106:8	<b>database</b> 125:15	<b>depending</b> 23:24	<b>documents</b> 12:20,22 13:6 20:3,14,21 43:22 72:1,5 73:21 82:13 90:13 91:15 120:24 122:11 124:15,23 125:24
<b>copied</b> 79:17,20	<b>created</b> 45:19 73:7 78:22 81:8 91:13,23 92:19 93:11, 14 104:1 105:3 125:1	<b>date</b> 13:23 14:22 16:12 73:15 93:7 98:23 99:2	<b>depo</b> 13:22	<b>Dog</b> 55:10 56:5,14 63:9 122:23
<b>copies</b> 85:12 86:7 90:6 100:19	<b>creating</b> 91:19 106:4, 12	<b>dates</b> 106:17	<b>deposed</b> 7:20	<b>dollars</b> 33:17 40:24 48:5,11 84:22 88:17
<b>copy</b> 75:10 106:18	<b>creation</b> 66:19 93:7	<b>day</b> 36:21 58:2 94:12 98:4,10, 11,19 101:20	<b>deposition</b> 7:23 12:13 13:6,15 14:2 17:11 99:7,18, 19 100:2,8 135:20 137:1, 2	<b>domain</b> 9:6,7,9 69:6,8, 13 70:10,15, 23 71:2 73:14 91:13,23 92:19 94:4,8, 10 96:13 103:9 107:8, 10 125:11
<b>corner</b> 132:12	<b>credit</b> 83:8 84:1 87:2 88:18 89:16 97:3 135:9	<b>De</b> 59:15	<b>describe</b> 11:11 62:14	<b>domains</b> 69:24 70:2 107:3
<b>correct</b> 8:18,19,20 10:11 12:14 13:7 19:2 20:18 21:11 34:21 35:12 36:24 37:1 43:2 48:10 50:23 55:9,13, 14 63:8 64:2 65:20 67:6 69:21 70:15, 16 71:8,17 77:4 79:15 86:22,23 89:9		<b>deal</b> 30:22 31:17 42:14 51:4 81:11 110:21 121:22 132:9	<b>determined</b> 12:8	<b>Double</b> 76:13
		<b>dealer</b> 29:9	<b>Dinner</b> 59:7	<b>doubt</b>
		<b>dealing</b> 47:8	<b>direct</b> 5:23 23:2 56:15 80:15	
			<b>directly</b> 26:10 34:15	

<p>91:12 <b>drive</b> 31:24 33:19 34:9 36:24 54:6 59:7 68:7 <b>driven</b> 128:7 <b>driving</b> 31:17 <b>drop</b> 125:11 <b>Drove</b> 131:14 <b>duly</b> 5:19 <b>dump</b> 33:17</p> <hr/> <p><b>E</b></p> <hr/> <p><b>e-mail</b> 18:24 33:21, 24 34:5,20 35:8,13,17,19, 23 36:3,15,17 52:19 84:7,8, 9,24 85:13 88:20 89:2 93:3 101:1,2, 5,22 102:2,4, 6,9,10 103:2 108:6,9,11,20 109:16,21 110:6 111:14 112:3,23 113:1 114:7,8 116:14 117:8 119:17,19 120:4 123:2, 15 125:18 132:16 135:13 <b>e-mailing</b> 35:18 <b>e-mails</b> 15:16 18:21 35:3 36:9,10, 12 85:12 86:6, 7,24 87:16 88:14 90:2,6 100:20,23 101:8,21 106:24 107:6 108:4,5,14,17</p>	<p>109:2,7,8,10 110:3,4 122:19 123:9 124:20 125:5, 6,7,17,21 135:7,15 136:4,24 <b>earlier</b> 58:14 103:4 111:16 115:12 126:3 127:11 136:5,14 <b>educate</b> 36:6 <b>Education</b> 24:20 <b>electronic</b> 41:10 <b>elimination</b> 135:22 <b>Elite</b> 46:11,12 47:14,16,23 <b>else's</b> 76:22,24 <b>Emma2304</b> 92:1 <b>employed</b> 20:24 <b>employee</b> 49:8,19 <b>employees</b> 21:15 51:22 52:1 <b>employer</b> 21:2 <b>end</b> 37:21,24 40:2, 16,24 41:4 43:9 44:24 50:20 51:4 76:1 77:19 127:19 <b>ended</b> 61:22 80:4 <b>ending</b> 83:22 <b>engine</b> 32:13 <b>engineer</b> 43:9,13 44:10 <b>entail</b></p>	<p>34:2 <b>entails</b> 35:2 <b>enter</b> 105:12,14 117:2 118:5, 20 132:21 <b>entered</b> 116:7 117:15 <b>entries</b> 95:10 <b>essentially</b> 89:5 101:8 <b>estimate</b> 52:4 <b>estimating</b> 14:24 <b>everyone's</b> 124:9 <b>evidence</b> 124:24 <b>ex-wife</b> 53:12,13 60:9 61:2 <b>exact</b> 11:2 12:10 14:22 <b>EXAMINATI ON</b> 5:23 <b>examined</b> 5:20 <b>Excel</b> 82:22 103:6 <b>Excepting</b> 131:5 <b>exchanges</b> 18:24 <b>exhibit</b> 5:3 8:19 70:11 75:10,14 78:5, 7 79:1,3 82:5, 20 83:3 89:2 90:9 93:7 95:10 100:15, 19 110:1,3 112:19 114:5 115:19 119:15 121:24 130:20 131:24 <b>exhibits</b> 8:6 74:23</p>	<p>75:7,8 76:11 <b>exist</b> 33:6 <b>expect</b> 135:21 <b>expensive</b> 129:20 <b>experience</b> 94:7 97:13 <b>expire</b> 40:12 95:8 97:4 <b>expired</b> 85:6 87:2 88:18 89:16 135:9 <b>expires</b> 93:23 94:17, 18 <b>explaining</b> 53:7 <b>Express</b> 83:22 84:3 <b>extra</b> 69:20</p> <hr/> <p><b>F</b></p> <hr/> <p><b>F-E-N-I-X</b> 18:15 <b>Facebook</b> 32:6 <b>fact</b> 70:22 <b>failed</b> 11:10,11 37:21 38:6,9 39:17 63:21 64:1 93:21 <b>fair</b> 11:14 21:20 54:22 62:14 71:1 105:9 117:10 121:19 <b>familiar</b> 38:17 57:2 64:20 65:7,10 67:1 81:3,20 92:3 93:20 96:11 <b>farm</b> 26:11 44:7</p>	<p><b>featured</b> 32:8 <b>fee</b> 42:24 129:18 <b>Fenix</b> 18:14,16 120:19 123:6 126:13 <b>Fenixleads</b> 114:13 <b>Fenixleads. com</b> 114:9 <b>fields</b> 70:8 <b>figure</b> 86:2 <b>filed</b> 106:15 <b>files</b> 17:8 122:10 <b>filled</b> 29:5 116:4 118:8 119:24 <b>finally</b> 6:20 <b>find</b> 33:9 43:15 44:22 48:4 52:24 53:3 54:6 63:15 79:16,22 81:11 87:17 119:11 133:23 <b>fine</b> 75:1 136:23 <b>finish</b> 39:10,11 <b>fires</b> 37:21 <b>firm</b> 20:5 <b>five-minute</b> 75:4 <b>fix</b> 61:21 <b>Florida</b> 59:5 80:19 <b>focus</b> 83:21 <b>folks</b> 50:7</p>
--	--	---	--	--

<p><b>follow</b> 134:10</p> <p><b>force</b> 98:9</p> <p><b>forget</b> 41:15 42:14 59:21 96:22 115:3</p> <p><b>forgot</b> 79:18,22</p> <p><b>form</b> 5:10 25:8 29:4 37:19 45:13 55:7 76:19,24 77:2,12 81:15, 23 115:20 117:16,20 118:5,6,13,23 119:22 123:16 128:2,4</p> <p><b>formed</b> 45:22 53:10 58:9</p> <p><b>forms</b> 118:7</p> <p><b>forward</b> 135:16</p> <p><b>found</b> 39:1 61:10 108:17</p> <p><b>frame</b> 128:22</p> <p><b>fraudulent</b> 104:12,14,17 105:3,7</p> <p><b>fraudulently</b> 105:17 106:4, 8,12</p> <p><b>free</b> 69:22,24</p> <p><b>friend</b> 62:13,15</p> <p><b>friends</b> 62:9,18</p> <p><b>full</b> 7:1 82:2 119:24 126:4</p> <p><b>fully</b> 7:8</p>	<p style="text-align: center;"><b>G</b></p> <p><b>game</b> 40:13</p> <p><b>gave</b> 38:2</p> <p><b>GEICO</b> 26:10</p> <p><b>general</b> 23:5 124:3 126:20</p> <p><b>generally</b> 30:5 35:23 40:14 41:3 42:6 44:17 52:18 81:6 94:8 96:15</p> <p><b>generate</b> 23:18,23 24:7 28:11 31:4 40:20 41:1 50:19,24 53:1, 9 127:12</p> <p><b>generated</b> 25:5 26:20 29:23 37:13 44:2 71:5,14 89:17 104:12, 16 127:16</p> <p><b>generating</b> 49:15 50:17, 22 126:9 127:17</p> <p><b>generation</b> 21:20,21 24:24 33:16 49:3,5 50:15, 16 54:18,23</p> <p><b>generator</b> 48:8,16</p> <p><b>George</b> 17:24 114:8,9, 15 119:18,20</p> <p><b>give</b> 6:14 12:9 14:13 20:10, 14 29:1 35:1 40:14,23 43:16,20 47:22 52:17 53:2 55:18,21, 22 69:22 98:4</p>	<p>99:5 124:6 129:14 133:3 134:16</p> <p><b>giving</b> 98:4,8 109:2</p> <p><b>gmail</b> 109:22</p> <p><b>Godaddy</b> 70:3 94:7,19 95:14 96:4,8, 16 103:4 107:9,17,20 113:17 129:21 136:8,12</p> <p><b>Godaddy's</b> 91:7</p> <p><b>Godaddy.com</b> 90:13 125:22</p> <p><b>good</b> 6:1,4,5 31:24 74:2 75:4</p> <p><b>Google</b> 32:5,15,21,23 33:3 41:17,22, 23 50:19 66:8</p> <p><b>grew</b> 54:21</p> <p><b>ground</b> 6:6 97:20</p> <p><b>guess</b> 14:7 26:3 33:22 38:24 52:22 56:16 60:16 62:16 63:4 72:7 77:22 78:2 83:16 94:4</p> <p><b>guessing</b> 38:3 64:3</p> <p><b>guys</b> 10:18 12:7,22 15:17,24 16:6, 10,11 39:1 72:3 73:2,9 98:19 106:16 112:9 134:12, 14</p> <p style="text-align: center;"><b>H</b></p> <p><b>hand</b> 11:24 12:1</p>	<p><b>happen</b> 118:20</p> <p><b>happened</b> 74:5 86:17 87:11,23 133:21</p> <p><b>happy</b> 6:9,18 97:19, 24</p> <p><b>he'll</b> 14:8,22 92:16</p> <p><b>head</b> 22:16</p> <p><b>health</b> 24:5,6 49:14</p> <p><b>hear</b> 6:22 37:6 99:23</p> <p><b>heard</b> 18:2,4,7,8,9, 14,16 24:14, 21 25:11,19 46:11 47:20 56:24 57:4 64:15,19 69:3, 15 82:9 83:10, 16 105:19,22 114:10,13 120:20 123:8 128:12 129:24 130:5 136:22</p> <p><b>hearing</b> 110:23</p> <p><b>hell</b> 85:1,7,11</p> <p><b>helped</b> 11:19 52:14</p> <p><b>helping</b> 52:13</p> <p><b>highest</b> 24:8 28:23 29:6,12 30:21</p> <p><b>hire</b> 43:11</p> <p><b>Hitpath</b> 42:18,20</p> <p><b>Hold</b> 20:11</p> <p><b>honest</b> 87:14</p> <p><b>honestly</b> 13:1,9 52:11</p>	<p>54:14</p> <p><b>hook</b> 31:15</p> <p><b>hosted</b> 94:22</p> <p><b>hosting</b> 94:17,18,19 95:7 107:13 111:22 112:14 117:22</p> <p><b>house</b> 12:24 59:22, 23 60:5 61:9, 17 65:3 92:9, 13,19</p> <p><b>houses</b> 67:17</p> <p><b>hundreds</b> 85:19 134:20</p> <p style="text-align: center;"><b>I</b></p> <p><b>idea</b> 14:13 35:1 40:15 43:21 51:5 53:2 55:18 110:12 129:14</p> <p><b>ideas</b> 62:10,17</p> <p><b>identification</b> 5:4</p> <p><b>identified</b> 5:19</p> <p><b>iframe</b> 76:21,23 117:14</p> <p><b>important</b> 39:10</p> <p><b>in-between</b> 30:20</p> <p><b>inactive</b> 45:17,18</p> <p><b>include</b> 10:12 71:16</p> <p><b>included</b> 20:8</p> <p><b>includes</b> 82:14 124:20</p> <p><b>including</b> 84:22 90:15 111:17</p>
---	---	--	---	--



<b>indicating</b> 94:2 95:13	<b>investigate</b> 106:19	<b>Justin@</b> <b>blueflame.com</b> 108:7	<b>language</b> 27:21 103:1 126:17 127:1, 5,8,22 128:7	12 29:10 30:8, 15,23 31:4,9, 13 39:22 40:19,20 42:10 43:7 48:3 49:15 50:3,5,14 51:1 71:5,14 77:22 78:2 104:12, 16 105:3 106:4,9,12 117:15 118:2, 4,9,15,23 119:6,10 126:9,18,19 127:6,12,15, 17 128:8 129:3 130:13 131:16,19
<b>industry</b> 28:18 51:6 121:17	<b>invoice</b> 82:16 84:22 86:13 90:16	<b>Justin@</b> <b>blueflamemail.</b> <b>com</b> 109:13	<b>law</b> 20:5	learn 106:14 120:6
<b>Infinite</b> 49:19	<b>invoices</b> 85:18	<hr/> <b>K</b> <hr/>	<b>lawsuit</b> 90:12 106:14 122:7,24 123:2,7,14,16, 19	<b>lease</b> 11:8
<b>information</b> 35:4,10,14 36:1 69:21 73:1 74:3 79:11 80:17 82:15,17 83:5 89:6 90:15 91:8 105:12, 14 111:5 114:18,20 116:4,8 117:3, 11 120:18,24 124:14 129:3, 13 130:22,24 132:4,21 133:11 134:8, 15 135:13	<b>involved</b> 14:9 39:5,6 50:22 65:18 66:21 72:8 74:9 118:2 121:11 126:14	<b>keeper</b> 135:20,22	<b>lawyer</b> 81:17	<b>leave</b> 17:5 55:7
<b>initial</b> 115:11	<b>involvement</b> 9:15 10:24 19:19 45:7 72:20 73:23 77:8 124:4 133:6	<b>Key</b> 59:7	<b>lawyer's</b> 13:8	<b>left</b> 132:12
<b>inside</b> 107:9	<b>IO</b> 27:4	<b>kids</b> 59:11 61:2	<b>lawyers</b> 20:4 105:24	<b>legal</b> 27:12 28:2
<b>instance</b> 27:9	<b>IP</b> 132:18	<b>kind</b> 22:24 29:1 30:16 32:7 33:12 36:5,7 41:1 43:3 44:9 48:8,10 65:21 67:16 72:19 124:5	<b>lead</b> 21:20,21,22 24:11,12,24 26:20 27:2,23 28:8,10,22,24 29:6,7,9,11,23 30:5 31:5,8 33:16 37:13 40:5,22,23 41:4,6,11 44:1,3,16 48:3,4,8,11, 13,16 49:3,5 50:15,16,19 54:18,22 56:1 57:24 69:2 71:1 76:24 77:2 80:13 105:7,17 114:17,18 118:9,11 121:12 124:24 127:21 128:13,15 129:1 130:23 131:2,16	<b>legally</b> 126:7
<b>instructions</b> 43:23	<b>issue</b> 6:21 105:17 114:18	<b>Kingston</b> 5:6,9,24 6:2 75:3 76:8 90:22 91:2 99:10 135:18 136:2,7,14,22	<b>Leadflash</b> 50:10 55:6,7	<b>letter</b> 27:12
<b>insurance</b> 11:8,20,22 23:7,9,10,13 24:5,6 25:14, 16 26:5,9,20 29:4 35:5 36:16 49:15 76:19 125:1 131:3,7,18 134:23	<b>issued</b> 82:5 90:11	<b>knew</b> 16:16 71:4 103:21	<b>leads</b> 21:19 23:1,2, 5,17,18,23 24:6,7,20 25:1,2,4,9,10, 11,13,20,23 26:4,13,19,21, 22,23 28:3,11,	<b>limited</b> 82:15
<b>integrate</b> 43:12 118:7	<hr/> <b>J</b> <hr/>	<b>knowing</b> 105:3,10,11 132:24		<b>link</b> 96:18
<b>integrated</b> 118:15	<b>JASON</b> 5:17	<b>knowledge</b> 13:5 16:13 67:4,14 70:13, 18 71:13 72:15,21 75:21 77:16 78:21 80:3 96:24 97:15 104:3,11 106:3 110:15 111:7,24 126:11 132:24 133:11		<b>list</b> 35:4 87:16 107:7
<b>Intelligence</b> 128:13	<b>Jeeps</b> 101:2			<b>listed</b> 83:7,22 84:17
<b>intermediary</b> 30:16	<b>Joe</b> 18:18 105:19 119:23 125:2			<b>literally</b> 82:1 88:15
<b>Internet</b> 95:2	<b>Jornaya</b> 128:13,14,15	<hr/> <b>L</b> <hr/>		<b>live</b> 59:20 60:2 61:1,15,23 65:11,12
	<b>Joseph</b> 125:3 130:23	<b>la</b> 59:15		<b>lived</b> 59:16 60:16, 21,22 61:18 62:3 64:22,23 65:6,11 80:20,
	<b>Josephson</b> 17:20			
	<b>Josh</b> 89:2			
	<b>July</b> 71:21 119:20			
	<b>June</b> 89:18 110:6			
	<b>Justin</b> 7:3 89:11			

21,23 92:20, 21	22 115:12 125:10 130:17	<b>majority</b> 71:3 116:11, 15	<b>matter</b> 122:7,24 123:7 124:11	<b>messages</b> 84:23 100:5 122:14
<b>lives</b> 59:10 81:5	<b>lose</b> 42:11	<b>make</b> 23:1 29:19 35:7 40:24 48:5 51:16 59:2 63:23 64:11 94:14 95:1 128:2,10	<b>matters</b> 46:1	<b>Michael</b> 18:12
<b>living</b> 60:14,18,24 61:3,11 92:18	<b>lot</b> 24:10 28:13 31:2 34:7 50:6 55:16 56:22 65:24 69:22 86:4 101:20 109:4 119:3 124:5	<b>making</b> 11:13 12:4,8 32:7 38:11 66:4	<b>Meaning</b> 8:5 104:9	<b>middle</b> 31:2 48:7 77:1 80:16 134:2
<b>LLC</b> 6:3 21:11 55:11 126:4	<b>lots</b> 20:13 42:6 55:24	<b>man</b> 48:7 80:16 134:2	<b>means</b> 7:7 55:19 97:2,11,13 127:18	<b>million</b> 66:1 78:13
<b>loan</b> 50:19	<b>lower</b> 21:22	<b>management</b> 55:17 57:22	<b>Media</b> 18:15 49:19 55:10 120:19 122:23 123:6 126:4,14 130:3 132:3, 10	<b>millions</b> 33:17 38:18
<b>loans</b> 69:11	<b>lunch</b> 98:13 99:12, 21	<b>managing</b> 120:11	<b>medical</b> 7:17	<b>mine</b> 66:20 79:17 133:13
<b>local</b> 23:23 33:14, 15	<hr/> <b>M</b> <hr/>	<b>manner</b> 31:13 102:23	<b>medication</b> 7:14	<b>minute</b> 97:17
<b>locations</b> 50:2	<b>Machine</b> 78:8 79:4	<b>Mantha</b> 105:20 119:23 125:3	<b>member</b> 47:13	<b>minutes</b> 65:16
<b>locksmith</b> 23:22 40:18 41:5 52:24	<b>Macy's</b> 36:11	<b>Mantha's</b> 18:18 105:7 130:23	<b>memories</b> 39:14	<b>mistake</b> 80:9
<b>locksmiths</b> 40:19,20,21	<b>Macys.com</b> 36:8	<b>March</b> 49:12	<b>memory</b> 38:5,7 64:2,3 65:18 70:18 71:13 74:13 85:23 87:5 88:6 89:20 91:18 93:10, 13,19 102:19 114:1 116:2, 20	<b>mix</b> 62:18
<b>log</b> 16:8	<b>made</b> 63:19 64:4,5 121:22	<b>mark</b> 75:7,8	<b>men</b> 31:3	<b>Mm-hmm</b> 25:3
<b>log-in</b> 87:17 92:1	<b>Madrid</b> 59:15	<b>marked</b> 75:10 78:4,24 82:4,20 89:1 90:8 100:15 109:24 112:18 114:4 115:18 119:14 121:24 131:23	<b>mention</b> 85:8,22 86:6 133:5,14	<b>model</b> 25:7 41:2
<b>logged</b> 88:2 125:22	<b>Mailgun</b> 82:6,10,11,21 83:4,9,11,16 84:20,24 85:10 86:8,15 87:9,14 89:3, 7,21 108:18 109:2 135:4,8 136:4,24	<b>market</b> 44:22	<b>mentioned</b> 8:17 30:8 32:10,12 34:20 40:4 42:3 43:20 51:9 57:23 63:6 66:8,14 112:16 115:2 126:3 134:17	<b>moment</b> 102:7 133:3
<b>long</b> 8:16 9:18 12:7,10,21 36:22 43:19 47:18 49:20 51:17 54:16 55:2 59:16 61:23,24 91:20 97:3 98:11,16 104:2 135:21	<b>Mailgun's</b> 86:22 89:6	<b>marketing</b> 18:5 21:6,11, 17,19 22:22 33:21,24 34:20 35:8,17 36:3,17 45:12 46:18 52:20 119:19 130:21	<b>message</b> 100:4	<b>money</b> 11:13 12:5,8 38:11 59:2 63:19 64:4,5, 11 66:4 86:4
<b>longer</b> 15:2 39:18 47:10,14 60:20	<b>mailings</b> 73:17	<b>Massachusetts</b> 19:10		<b>month</b> 73:19 86:3
<b>looked</b> 7:24 10:18 12:13 13:6 14:17 72:9 88:13 106:20, 23 107:12,22 113:12,16,17,	<b>main</b> 22:23 31:1 37:7 45:20 96:9 109:23			<b>monthly</b> 42:8,24 53:8 68:12 94:21 129:12,18
	<b>maintain</b> 43:1,4			<b>months</b> 12:10 110:8 111:6 128:19, 24

<p><b>move</b>                      17:1 62:1                      80:16  <b>moved</b>                      60:22,23                      61:15,19,21  <b>moving</b>                      128:18  <b>multiple</b>                      17:16 28:4,10                      29:3 30:13                      34:18 43:14                      44:5 85:21                      87:10</p> <hr/> <p><b>N</b></p> <hr/> <p><b>N-O-M-I-C-S</b>                      24:13  <b>Namecheap</b>                      70:3  <b>named</b>                      17:24 18:9                      38:17,18                      114:10,15  <b>names</b>                      17:18 22:11,                      15,21 39:3                      42:16 45:21                      51:11 52:6,10                      71:2 72:10                      94:11 96:13                      107:8,10                      131:21  <b>narrow</b>                      134:22  <b>nationally</b>                      23:24  <b>Nature</b>                      40:13  <b>needed</b>                      20:7 52:15,23  <b>neighborhood</b>                      64:21 65:10                      81:2  <b>netdomainnam</b>  <b>eregistration</b>                      97:8  <b>network</b>                      9:23 46:20                      47:24 48:7  <b>Nexus</b>                      68:5,7</p>	<p><b>Nomics</b>                      24:11,13  <b>normal</b>                      121:3  <b>notarization</b>                      5:14  <b>notary</b>                      5:20  <b>notwithstandin</b>  <b>g</b>                      72:14,20  <b>number</b>                      19:11 75:24                      76:7 77:19,24                      84:10,11,13                      89:13 92:23                      115:9,10,15,                      16,23 116:13,                      24 122:5,22                      123:5,12                      124:15,23                      127:4 132:14  <b>numbers</b>                      78:1 84:6                      115:5,7                      116:16,21</p> <hr/> <p><b>O</b></p> <hr/> <p><b>Oaks</b>                      64:16,20                      80:18  <b>oath</b>                      7:5 99:14  <b>object</b>                      5:14  <b>Objection</b>                      30:2 31:10,22                      33:23 34:3,22                      35:11,16 36:2                      37:5 64:9,13                      71:22 72:6                      78:11 95:3                      96:1,6 104:18                      117:13 121:5                      129:4  <b>objections</b>                      5:10,15  <b>obligated</b>                      7:8,11  <b>occurred</b>                      95:24</p>	<p><b>odd</b>                      116:3  <b>Odor</b>                      89:2  <b>offers</b>                      11:5 25:17                      26:5 48:2                      129:21  <b>Offervision</b>                      8:10 9:23                      10:3,9 14:21                      57:8,10,14,24                      58:7,9,12,15,                      18,24 63:8                      67:5,8 111:17                      115:2 126:3,4,                      6  <b>offhand</b>                      67:3  <b>office</b>                      13:7 18:22                      19:1,11 67:11,                      19,24 68:10,                      12  <b>officer</b>                      21:10,13                      51:20  <b>officers</b>                      53:11  <b>offices</b>                      67:15  <b>on-line</b>                      21:18  <b>one's</b>                      78:8  <b>open</b>                      12:17 76:11                      98:24  <b>operate</b>                      21:24 22:4                      83:18  <b>operated</b>                      68:24  <b>operating</b>                      10:10  <b>operational</b>                      10:20 16:3                      130:11  <b>opinion</b>                      123:24  <b>opt-in</b>                      27:8,20,24</p>	<p>126:17  <b>opted</b>                      35:3,9  <b>optimization</b>                      32:13  <b>option</b>                      89:17  <b>options</b>                      98:8,21  <b>oral</b>                      6:14  <b>order</b>                      29:15  <b>originally</b>                      12:21  <b>Osmanovic</b>                      18:10 114:8,                      11,17 119:20,                      21 120:13  <b>outbids</b>                      29:8  <b>overseas</b>                      74:3  <b>owned</b>                      8:6,15,21 9:1                      17:7 48:22                      51:10 54:7                      58:12 59:23                      60:2 67:5                      68:20 92:9                      107:4 113:5,8,                      11,23 114:2  <b>owner</b>                      57:12 60:8                      82:13 83:6                      90:14 91:8                      114:23 119:12  <b>owners</b>                      68:6  <b>ownership</b>                      39:21 57:16  <b>owns</b>                      16:14 69:19                      120:10</p> <hr/> <p><b>P</b></p> <hr/> <p><b>package</b>                      9:22  <b>pages</b>                      25:16  <b>paid</b>                      29:18 31:24</p>	<p>32:4,14,18                      33:2 43:9                      49:16 52:19                      53:21 62:21,                      24 63:2 68:22                      85:9 95:14                      96:7,16  <b>paper</b>                      31:15  <b>paperclip</b>                      25:14  <b>paperwork</b>                      105:23  <b>part</b>                      20:8 30:22                      46:14 54:24                      69:24 121:3  <b>Partly</b>                      60:3  <b>partner</b>                      36:15 57:15,                      20 62:14  <b>partners</b>                      36:11,13,19                      37:24 55:22                      56:13 81:11  <b>partners'</b>                      36:9  <b>party</b>                      123:13  <b>pass</b>                      41:8  <b>password</b>                      92:6  <b>past</b>                      24:16 25:21                      26:15 34:8                      40:6 67:15                      73:18 81:8                      121:9,10                      128:19  <b>pasted</b>                      79:18  <b>Path</b>                      130:3  <b>pause</b>                      20:12 32:24  <b>paused</b>                      33:6  <b>pay</b>                      9:9 34:9 42:8                      50:18 54:3</p>
---	--	--	---	--

69:20 82:2 89:24 94:8,21 96:18 98:10 118:10 129:12,18 <b>pay-as-you-go</b> 89:17 <b>payday</b> 50:19 <b>paying</b> 9:5,7 40:21 48:2 84:19 86:5 87:8,20, 24 94:24 96:4 97:1,16 98:19 103:9,14 135:4 <b>Paypal</b> 108:20 <b>people</b> 26:23 28:16 30:11,14 31:2 33:17 34:6,14, 23 35:3 38:2 39:3 43:7 44:24 48:4,6 51:1,24 52:13 53:8 69:13 74:2 82:3 94:10 116:13 121:8 126:19 128:1,18 133:24 <b>people's</b> 118:7 <b>percent</b> 53:4 <b>permission</b> 36:15 <b>person</b> 51:2 79:19 102:1 120:6, 13,16,20 122:13 123:14 125:20 127:5 <b>personal</b> 70:6,13,18 105:12 109:16 111:24 126:11 <b>personally</b> 17:4 109:18 <b>Phoenix</b> 18:16	<b>phone</b> 19:3,6,10 27:10 76:7 84:10,11,13, 15 92:23 93:1 101:18,23,24 102:1,11,12 115:4,5,7,9, 15,16,23 116:13,16,21, 24 122:13 127:4 132:14 <b>physical</b> 52:1 <b>place</b> 27:3 30:1 31:8 44:18,21 45:3 117:16 127:7 <b>plaintiff</b> 18:17 <b>plaintiff's</b> 125:13 <b>plaintiffs'</b> 18:22 19:1,4 82:6 89:3,5 90:12 91:7 105:6 110:4 112:6,24 <b>platform</b> 26:8,13 31:16 43:3 85:19 109:23 <b>platforms</b> 41:14 42:3 <b>plug</b> 127:3 <b>plumber</b> 23:2,21 53:1 <b>plumbing</b> 23:1 <b>Plural</b> 18:5 119:18 130:21 <b>point</b> 6:7,21 36:1,5 39:6 53:12,20 54:8 63:7 68:15 71:10 87:23 88:6 89:24 92:14 99:1,18 119:7 131:4	<b>policies</b> 81:8 <b>policy</b> 27:8,20 39:1 74:7,10 79:5, 21 80:4 81:21 82:2 133:15 <b>pop</b> 118:21,22 <b>portfolio</b> 23:12 106:23 107:2,7 <b>portion</b> 79:10 <b>possession</b> 124:24 <b>possibly</b> 41:19 44:19 <b>posting</b> 43:23 44:1 <b>practically</b> 118:19 <b>pre-marked</b> 5:4 75:7 130:20 <b>prepare</b> 7:22 20:22 <b>prepared</b> 20:20 <b>preparing</b> 12:12 13:14 <b>presence</b> 33:13 <b>present</b> 71:11,16 109:11 <b>pretty</b> 10:14 38:5 77:14 120:15 <b>previously</b> 115:18 <b>price</b> 29:6 41:8 43:16 <b>primary</b> 108:9 <b>prior</b> 9:24 15:14 48:20 59:20, 24 60:17 73:3 <b>privacy</b> 8:23 27:8,20	38:24 74:7,10 79:5,21 80:4 81:8,21 82:2 133:15 <b>private</b> 69:11,14,18, 21 <b>problem</b> 99:3 <b>problems</b> 110:9 <b>process</b> 135:21 <b>produced</b> 114:7 <b>professional</b> 62:24 <b>profitable</b> 38:1 <b>programmer</b> 43:8 <b>project</b> 11:10,12 12:2 36:21 37:9,22 38:3,10 <b>projects</b> 12:1 53:21 <b>prominently</b> 32:8 <b>promise</b> 98:15 <b>promote</b> 25:9 26:11 34:6,14 37:18, 19 48:4 <b>pronounced</b> 126:5 <b>properly</b> 126:5 <b>provide</b> 21:19 24:23 26:4 27:1,21 37:16 38:23 42:7 44:14 55:20 85:12 88:12 117:16 129:15 135:13 <b>provided</b> 20:3 26:17 37:2,17 81:9 114:19 116:8 119:18 120:18	127:5 130:22 <b>providing</b> 90:6 114:17 119:21 134:1 <b>public</b> 5:20 <b>pulled</b> 74:8 133:22 <b>purchased</b> 61:14 <b>purpose</b> 104:19 <b>purposes</b> 28:2 39:9 <b>push</b> 37:9 <b>put</b> 17:22 39:3 48:3 78:16 80:7,11 85:19 92:12 94:17 118:5 133:24 <b>putting</b> 11:5 <hr/> <b>Q</b> <hr/> <b>question</b> 6:8,12 28:9 39:11 72:19 <b>questions</b> 7:8 8:2 36:22 83:20,21 120:16 133:4 135:19 136:3 <b>quick</b> 74:24 <b>quickly</b> 98:15,18 <b>quote</b> 24:3 33:18 39:2 <b>Quotewizard.</b> <b>com</b> 6:3 <hr/> <b>R</b> <hr/> <b>ran</b> 32:14,18,20 40:1 50:6 57:24 67:8 104:23 131:8
---	--	---	---	---

134:3 <b>random</b> 61:9 <b>randomly</b> 86:3 <b>Raton</b> 59:5 64:16 68:1 80:19 <b>re-bill</b> 97:3,13 <b>re-billed</b> 97:4 <b>reach</b> 121:4,6 <b>reached</b> 10:19 73:9 120:23 <b>read</b> 5:12 13:10 44:9 81:18 82:1 125:10 <b>real</b> 29:5,10 129:13 <b>realize</b> 88:1 <b>reason</b> 86:17 87:19 89:23 91:12 127:17 <b>recall</b> 11:2,21 16:19 19:17,21 22:15,20 25:8 26:12 38:9,10, 19 42:12,16, 22 45:2 51:10 52:10,14 63:19 66:4,24 81:2 84:19 86:10 88:6,8 93:22 101:19 102:16 103:5 104:10 105:6 107:24 108:2 131:6,21 134:24 136:8 <b>receive</b> 35:4,10 36:1, 9,12 <b>received</b> 100:20 106:18 109:20 130:21	132:3 <b>receiving</b> 27:11,22 35:23 36:10 <b>recent</b> 65:8 73:8 <b>recently</b> 71:21 73:12 128:17 131:20 <b>recess</b> 75:5 99:12 <b>recognize</b> 75:17 76:17 77:24 100:23 132:18 <b>record</b> 5:10 7:2 16:23 38:13 39:20 41:21 74:12 75:6 90:5,20 93:5 99:5,11, 13 136:1 <b>records</b> 39:23 41:10 43:4 86:22 89:24 130:16 135:20,23 <b>recurring</b> 97:2,5,6,11 <b>redirect</b> 118:22 <b>refer</b> 40:16 <b>references</b> 79:14 80:18 85:15 <b>referral</b> 53:5 <b>referring</b> 66:14 111:13 <b>reflecting</b> 95:23 <b>refresh</b> 85:23 89:20 93:10 <b>register</b> 38:20 69:8,12, 13,23 96:9 <b>registered</b> 38:20 46:3 70:10 136:19 <b>registering</b>	96:13 <b>registers</b> 69:5 107:10 <b>registrant</b> 82:16 <b>regular</b> 76:18 <b>relate</b> 115:6 124:16, 24 135:6 <b>related</b> 17:8 22:4,14, 17,19 79:22 83:14 100:4,6 107:1 108:12 109:15,19 130:18 134:23 135:12,14 <b>relating</b> 82:13 90:13 108:22 121:20 <b>relation</b> 106:20 <b>relative</b> 24:23 31:20 32:16 100:10, 12 101:21 <b>relevant</b> 46:1 51:18 <b>relying</b> 36:7 <b>remember</b> 9:18 10:4 14:16 15:19 16:2 19:9,12, 20 24:20 26:6 38:15 40:8 46:6 57:19 60:7 64:4 67:2 74:15 77:11 107:17 133:8 134:5 135:3 <b>rent</b> 61:6 68:11 <b>rented</b> 60:3 61:4,5, 19,20 92:13 <b>renting</b> 59:22 61:8 <b>rephrase</b> 6:9 62:23 <b>replace</b>	79:22 81:12 133:23 <b>replied</b> 102:5 113:24 <b>reply</b> 101:14 <b>reporter</b> 39:9 <b>reporting</b> 42:9 <b>represent</b> 6:2 89:4 91:6 <b>request</b> 83:5 124:24 130:3 136:3,7, 9 <b>requesting</b> 82:12 <b>requests</b> 20:9,17 111:4 122:5 <b>require</b> 42:24 <b>reserved</b> 5:11 <b>reside</b> 59:4 <b>respect</b> 123:22 <b>respond</b> 75:1 102:8,11, 22 <b>responded</b> 102:16 <b>responding</b> 102:17 111:4 <b>response</b> 20:21 82:21 83:4,5 86:14 89:6 91:7 103:5,8 108:18 130:21 132:2 <b>responses</b> 101:12 <b>retainer</b> 17:22 53:9 <b>revenue</b> 45:24 <b>review</b> 12:20	<b>reviewed</b> 12:22 <b>reviewing</b> 73:21 <b>Revpoint</b> 130:1,2 132:3, 10 <b>rich</b> 71:5 <b>ring</b> 65:21 <b>rings</b> 66:2 <b>Rios</b> 17:24 114:8,9, 15 119:18,20 <b>Road</b> 67:23 68:3,14 <b>role</b> 31:20,23 49:6 124:7 <b>rules</b> 6:6 <b>run</b> 9:13 23:15 28:3,14,15 31:12 56:1,14, 15 62:17,20, 22 67:12,17 74:4 119:1 131:12 <b>running</b> 9:16 11:14,17, 21 12:7 22:10 23:14 27:16 50:3,5,13 58:11 62:2 66:4 80:13 103:18,22 104:4,9 105:1 131:9 <b>runs</b> 57:6 71:7 104:21 <hr/> <b>S</b> <hr/> <b>safe</b> 61:14 <b>sale</b> 14:9 58:23 59:1
---	--	--	--	---



<b>sales</b> 52:21,22 54:5	28:10 34:15 60:17 121:11 127:19 131:16	136:24	<b>sign</b> 5:13 24:3 29:18 30:10 53:8	18,22 95:5,6 105:15 106:21 110:8,20,24 111:6,9,21 112:10 113:5, 9,15,17 114:23 115:4, 8 117:5,22,24 119:13 120:10,11 124:4 125:10 127:3 128:10 129:5,7 130:18 133:11,22 134:9 135:7, 14 136:13,18, 19
<b>satisfactorily</b> 5:19	<b>sells</b> 29:7	67:19,23 74:22 75:11 88:21 100:16	<b>signature</b> 12:23	<b>site's</b> 10:15,16 38:12 73:10, 11
<b>saved</b> 107:23	<b>send</b> 30:13 35:3 42:10 44:3,14 48:5 135:15 136:4	<b>shared</b> 67:15,16,22 68:10	<b>signed</b> 27:5 35:24 119:23	<b>sites</b> 9:19,20 11:20, 22 16:24 17:4 22:9 23:5 28:13,23 32:1 33:11,12,16 34:7 37:12 38:17,18 40:5 41:19 44:21 54:7 55:22 57:9 58:18 65:24 74:1 78:13 79:24 81:7,10,22 85:21 86:12, 19 87:10 88:2, 9 107:13 116:11,15 131:8,10
<b>scenario</b> 30:15 31:7	<b>sending</b> 13:8,9 30:10 43:7 45:11 134:13	<b>shops</b> 23:4	<b>significant</b> 49:1	<b>sitting</b> 94:11 113:21
<b>schedule</b> 14:2 90:20,23	<b>sends</b> 44:6	<b>shop</b> 33:13,14	<b>similar</b> 46:19 50:13 101:16 102:22 133:7	<b>skills</b> 31:3
<b>screen</b> 8:12 9:24 12:17 74:22 75:11,12,14 76:17 78:7 79:3 88:20,21 91:4 100:16 115:11 119:21	<b>sense</b> 47:22 51:12 52:17	<b>shot</b> 75:14 76:17 78:7 79:3 115:11 119:21	<b>simpler</b> 72:19	<b>Skype</b> 100:6
<b>scrolling</b> 79:10	<b>sentence</b> 111:12	<b>shots</b> 9:24	<b>sit</b> 107:24 110:7	<b>slash</b> 62:15
<b>scrub</b> 95:1	<b>SEO</b> 32:1,12,13 33:8,11,15 37:12	<b>show</b> 44:23 48:2 75:9 77:15 78:4,24 82:4, 19 90:8,18 94:23 100:15 109:24 112:18 114:4 119:14 127:24 130:19 131:23 135:9	<b>site</b> 8:6,7,9,10,15 9:1,3,4,8,11, 20 10:22,24 11:19,20 13:3, 18 14:4,17 15:18,20 16:5, 18,19,22,23 17:9 19:18 20:15,23 22:4, 23 23:1,20,22 26:2,12 27:6, 13,14,18 28:1 29:21 30:3 31:17 32:24 33:1,19 34:5, 7,9,10,16,19, 24 35:6,21 37:13,18,23, 24 38:6,8,11, 16,19,22 39:5, 6,7,20,21 40:2,15 41:19 47:10,12 56:18 57:5 63:22 64:1 66:3,5,6 67:1 71:24 72:18 73:24 74:2,4, 9,11,12,13 76:22 79:17, 22 80:13,14 81:14 83:15 87:23 94:2,14,	<b>small</b> 76:2
<b>Seal</b> 55:10 56:5,14 63:9 122:23	<b>separate</b> 62:17 67:17	<b>showed</b> 17:17 103:4, 12 115:8 135:8	<b>showing</b> 17:13 82:22 87:1 88:10 89:1 91:16 100:19 115:9, 18	<b>smart</b> 80:16
<b>search</b> 32:1,4,13,14, 18 33:3 43:11 51:12 52:19 56:3 66:8 107:20 108:4, 11,22 122:10 125:7,13,16	<b>September</b> 75:16 93:8,23 95:15 100:21	<b>shows</b> 48:1 67:7 69:10 70:21 82:24 86:13 87:1,2 88:17, 18 116:5 135:10	<b>show</b> 17:17 103:4, 12 115:8 135:8	
<b>searched</b> 107:18 125:7	<b>servers</b> 38:21 66:11 133:12	<b>shown</b> 31:4	<b>showed</b> 17:17 103:4, 12 115:8 135:8	
<b>searches</b> 33:2	<b>service</b> 24:23 26:17 29:20 37:2 42:7 63:3 69:24 84:19 85:13,24 86:1, 10,16 87:8,24 88:7,8 89:16 96:16 124:17 129:15	<b>shows</b> 48:1 67:7 69:10 70:21 82:24 86:13 87:1,2 88:17, 18 116:5 135:10	<b>showing</b> 17:13 82:22 87:1 88:10 89:1 91:16 100:19 115:9, 18	
<b>searching</b> 125:5,21	<b>services</b> 33:8 46:13 63:1 69:22 88:11 90:1 95:14 96:4,7, 11 129:22 135:4	<b>side</b> 19:8 43:10 47:4,6 50:22 131:16	<b>showing</b> 17:13 82:22 87:1 88:10 89:1 91:16 100:19 115:9, 18	
<b>seeking</b> 91:7	<b>set</b> 43:22 44:8 98:23 99:2		<b>showing</b> 17:13 82:22 87:1 88:10 89:1 91:16 100:19 115:9, 18	
<b>sell</b> 24:8 25:4 26:22 27:2 28:5,7,23 30:21 50:19 56:12 60:12 61:21 63:2 94:12 118:9, 10 127:13,21			<b>showing</b> 17:13 82:22 87:1 88:10 89:1 91:16 100:19 115:9, 18	
<b>selling</b> 11:8 26:23			<b>showing</b> 17:13 82:22 87:1 88:10 89:1 91:16 100:19 115:9, 18	

<b>Snappy</b> 8:17 10:12 22:20 28:21 32:14,18 33:3, 10,19 34:14 35:15,19 36:18,20 37:3, 16 38:17,18 58:3,15 65:23 66:1,3,18 67:2 107:15 108:23 122:17,18 125:9 130:10 136:11 <b>Snappyauto</b> 25:24 29:22 34:17 39:23 45:2 125:9 <b>Snappyauto.</b> <b>com</b> 31:21 35:15 45:8 <b>Snappyautoins</b> <b>urance</b> 8:5 10:17 13:11 19:19 35:20 47:17 66:6 78:8 79:24 81:7 86:11 87:6 95:15 100:13 108:12 110:16 111:5 116:21 119:22 120:8 125:8 126:8 131:5 <b>Snappyautoins</b> <b>urance.com</b> 15:9 63:20 64:12 65:16 68:16 70:9 71:7 75:16 79:4 80:5 90:14 103:10, 19 105:13 106:5 111:17 125:2 126:22 130:14 132:21 <b>Snappyautoins</b> <b>urance.com.</b> 78:15 82:14 83:6 86:16 91:9	<b>Snappys</b> 58:18 <b>Snappysurvey</b> 65:24 <b>Snappysurveys</b> 58:6 <b>Snappysurveys</b> <b>.net</b> 57:1 66:23 <b>sold</b> 8:9,15 9:23 10:4,8,9 14:6, 18,21 28:4,12 39:22,24 41:4, 11 46:15 48:11 51:1,2 57:9,17 58:15, 19,20 59:22 71:14 111:16 112:12 115:2 120:12,23 121:2,14 130:13 131:19 133:9 <b>sole</b> 21:13 57:12 60:8 <b>Solutions</b> 123:6 <b>someone's</b> 35:9,18 115:22 126:19 <b>sounds</b> 23:13 38:16 57:2 64:20 65:7,9 67:1 81:2 93:20 <b>South</b> 60:22 <b>space</b> 26:2 67:16,19, 24 68:11 <b>spaces</b> 67:23 <b>speak</b> 13:14,17 14:7 17:11 56:16 102:10 <b>speaking</b> 30:5 40:14 41:3 42:6 44:17 64:1 96:15 101:22	118:19 <b>specialty</b> 42:15 51:8 <b>specific</b> 57:19 65:17 78:14 116:20 <b>specifically</b> 24:2 27:16 39:15 101:21 <b>specifics</b> 51:7 <b>spinoff</b> 46:16,17 47:10,12 <b>split</b> 54:8 <b>spoke</b> 13:18,20 14:19 17:10 19:7,17 102:7, 10 111:10 133:4 136:4 <b>spoken</b> 122:13 <b>spreadsheet</b> 82:22 103:6 <b>SSO</b> 32:10,12 <b>stall</b> 97:18 <b>standard</b> 81:21 126:24 127:2 <b>start</b> 5:7 6:7 36:10 41:22 48:22 53:24 62:7 76:16 <b>started</b> 15:16,24 28:18 46:21 49:9 50:10 53:23 73:20 128:17,18,23 134:8 <b>starting</b> 53:6 <b>starts</b> 127:9 <b>state</b> 7:1 23:19 26:11 61:19	67:22 68:3,14 <b>stay</b> 98:9,11 <b>staying</b> 61:22 <b>step</b> 48:9 <b>steps</b> 94:15 106:19 125:23 <b>stick</b> 51:15 <b>stips</b> 5:7 <b>stop</b> 98:18 <b>stopped</b> 85:6 <b>store</b> 43:4 <b>stores</b> 17:8 <b>street</b> 68:9,13 <b>strike</b> 5:12 92:13 125:6 <b>stuff</b> 12:24 13:24 18:20 19:2,15 24:10 25:14 37:8 41:16,17 42:14 45:10 49:9,14 51:4, 14 52:3 57:21 63:4 67:18 85:1 86:24 87:22 104:14 107:23 112:10 113:10 117:15 119:5 134:12, 13 <b>style</b> 81:20 <b>subject</b> 122:7,24 123:7 125:11 <b>submit</b> 36:8 <b>submitting</b> 27:23 <b>subpoena</b>	20:8,17 82:5, 12,20 83:4 86:14 89:6 90:11 91:7 98:6 103:5,8 106:1,19 108:18 122:3 124:2 130:20 132:2 <b>subpoenaed</b> 113:13 <b>substance</b> 19:12 101:8 <b>successful</b> 40:12 62:16 <b>suggest</b> 92:18 <b>surprise</b> 71:20,23 <b>surprised</b> 120:6,9 <b>switched</b> 41:17 <b>sworn</b> 5:19 <b>system</b> 41:13 <b>systems</b> 66:7,9 <hr/> <b>T</b> <hr/> <b>taking</b> 74:19 110:18 111:20 112:13 <b>talk</b> 13:23 14:4 65:15 66:17 74:19 100:10 101:20 108:16 110:18 112:2 <b>talked</b> 11:24 58:20 66:23 100:1 110:20 112:10 123:1,3 134:15 <b>talking</b> 8:18 27:15 39:12 42:4 70:22 73:12 85:3 88:5 94:8 101:17 110:12
--	--	--	---	---

115:19 <b>TCBA</b> 126:24 127:4 128:7 <b>technically</b> 48:12 <b>Technologies</b> 82:7,10,11,21 83:4,11 84:20 86:15 89:3,21 <b>Ted</b> 5:6,14 76:8 90:23 <b>telephone</b> 75:24 102:20 <b>telling</b> 15:19 102:11 105:6 113:14 116:23 <b>ten</b> 124:12 <b>tenant</b> 61:10 <b>term</b> 27:12 28:24 66:18 69:2,4, 15 <b>terms</b> 12:12 14:24 27:19 28:1 29:20 34:7 78:9,12,14,22 125:8 131:16 <b>test</b> 129:19 <b>tested</b> 9:17,21 11:1,4 <b>testified</b> 5:20 58:14 71:6 103:17 111:16 115:1 116:1 120:22 127:11 <b>testify</b> 7:15,18 98:7 <b>testimony</b> 38:15 39:13 50:21 58:16 63:24 65:17 77:5 78:21 80:5 104:15 105:16 106:7	111:7 128:6 131:6 132:20 135:3 <b>testing</b> 87:23 <b>text</b> 100:5 122:14 123:15 <b>texts</b> 123:9 124:20 <b>thing</b> 14:17 19:7,22 26:19 37:7 45:10 58:7 89:22 115:9 123:4 128:19 134:6 136:20 <b>things</b> 11:7 50:23 52:12 108:3 <b>thinking</b> 26:7 <b>thinks</b> 58:20 <b>thought</b> 32:12 111:16 112:11 113:5, 8,11,13 133:9 <b>thousands</b> 9:19 94:10 <b>thumbnails</b> 76:6,11 <b>time</b> 5:11 6:17 8:16 10:18,23 11:9 12:2,11,22 13:20 14:2,14 15:20 16:2 19:24 29:6,10 41:12,13 43:15,19 45:3 47:18 49:10 51:17 52:15, 20 53:6,10 54:5,7 56:6 58:19 61:15 62:5 69:18 70:4 73:3,8 74:4 75:4,8 87:6 88:2 91:20 92:16 94:5 98:4 99:6 103:21 104:2,	4 105:22 109:4 110:23 113:5 114:1 121:18 124:5 127:21 128:22 131:11 132:6 <b>times</b> 17:11 41:18 68:6 <b>tint</b> 23:4 33:13,15 <b>today</b> 7:5,14 13:19 98:22 99:15, 23 100:3,9 107:24 <b>today's</b> 12:12 13:5,15 <b>told</b> 15:10 71:20 101:10 102:17 112:5 116:6 123:18 124:10 <b>ton</b> 28:15 84:2,24 <b>top</b> 22:15 132:11 <b>touch</b> 99:22 <b>track</b> 54:15 81:5 106:17 <b>trade</b> 44:22 <b>traffic</b> 31:17,24 32:1, 19 33:20 34:4, 6,8,9,11,15 36:24 50:6,17, 18,22,24 51:3 53:1,9 54:7 55:21 56:2 127:10 128:2 131:14 <b>transaction</b> 95:24 <b>transcript</b> 5:13 <b>transfer</b> 48:13 66:12 <b>transitioned</b> 41:23	<b>trap</b> 41:16 <b>trial</b> 5:11 <b>true</b> 116:18 <b>truthfully</b> 7:12 <b>type</b> 23:4 33:11,15 44:14 63:15 84:24 129:10, 15,21 <b>types</b> 44:4 <b>typically</b> 34:11 36:23 48:15 69:20 117:6,8 128:7  <hr/> <b>U</b> <hr/> <b>Uh-huh</b> 114:6 <b>understand</b> 6:8,15 7:4,7 9:1 10:1 22:19 35:22 38:14 39:13 50:21 <b>understanding</b> 10:8 35:7 63:24 <b>understood</b> 6:11 <b>Unit</b> 64:16 80:18 <b>Unitedquotes.</b> <b>com</b> 130:6 <b>unnecessary</b> 17:23 <b>URL</b> 94:17 <b>usage</b> 89:18 <b>user</b> 129:6,9 <b>usual</b> 5:7	<hr/> <b>V</b> <hr/> <b>verification</b> 129:10,22 <b>verify</b> 16:21 129:12 <b>versa</b> 63:18 <b>versions</b> 66:1 <b>vertical</b> 29:5 <b>vice</b> 63:18 <b>viewing</b> 91:21 <b>virtual</b> 6:20 <b>visit</b> 72:24 73:15 <b>visited</b> 15:22 73:4,12, 18  <hr/> <b>W</b> <hr/> <b>W-2</b> 52:1 <b>wanted</b> 33:13 35:4 62:1 <b>wasted</b> 124:5 <b>Wayback</b> 78:7 79:3 <b>Waybackmach</b> <b>ine.com</b> 75:15 <b>ways</b> 34:18 117:18, 22 <b>web</b> 21:6,10,17 22:22 25:11, 13,20,23 26:4, 13 30:8,15,23 31:9,13 45:12 46:18 77:3 115:19 117:15 118:2,4,9,13, 15,23 119:6, 10
---	--	---	--	---

<p><b>webmaster</b>                      69:2,9,17                      120:2,7</p> <p><b>website</b>                      8:22 11:18                      13:21 14:14                      16:3,9,14                      23:15 24:2                      27:16 28:3,11,                      14 29:23                      30:16 31:4,9,                      12,15 32:7                      33:20 34:12,                      13 36:12,14,                      24 39:14                      40:19 51:4                      56:17,24 57:3                      58:11 65:18,                      21 68:20                      69:18 71:14,                      18 72:2,11,13,                      15,16,22,24                      73:4,23 74:20                      75:19,22 77:6,                      9,17 79:20                      80:12 81:24                      82:13 85:15                      90:14 91:8,19                      93:11,14                      103:15                      104:12,16,21                      105:1 107:1,4,                      5,14,21                      113:11,23                      115:7 117:11                      119:10,24                      120:13,19,22                      121:2,7 124:8,                      16 127:12,22,                      23 128:3                      130:5 134:4                      135:10,15</p> <p><b>website's</b>                      44:12 118:6                      127:8,15</p> <p><b>websites</b>                      10:9 22:1,3,5,                      12,21 23:8                      24:1 28:15                      29:11 30:6                      31:24 36:14,                      19 37:8 44:16                      49:3 55:20</p>	<p>56:1,14,20,22                      57:24 58:4                      67:2 69:3 70:1                      71:2 77:13                      85:19,22 86:6                      87:16 88:17                      90:3 107:15                      116:6 117:18                      118:7 119:1                      121:8,12                      126:16 127:1                      128:16 129:1                      130:10 131:2,                      7,12,18</p> <p><b>websites'</b>                      131:21</p> <p><b>weeks</b>                      14:11 15:11</p> <p><b>weird</b>                      133:18</p> <p><b>whatsoever</b>                      111:8</p> <p><b>whoever's</b>                      19:11</p> <p><b>wife</b>                      20:5 59:11                      61:2,7 123:17</p> <p><b>wife's</b>                      59:12</p> <p><b>window</b>                      23:3 33:12,15</p> <p><b>Wizard</b>                      33:18 39:2</p> <p><b>wondering</b>                      86:5</p> <p><b>word</b>                      53:5 56:17                      57:10,11                      126:4</p> <p><b>words</b>                      38:6 50:14</p> <p><b>work</b>                      11:6,7 16:24                      17:5,16 26:10                      29:14 30:7                      34:14 37:10                      43:10,13                      54:22 56:6,7                      57:14,19                      74:17 98:3,10,                      20 100:7                      108:9 128:3,4</p>	<p><b>worked</b>                      9:21 11:23                      18:6 24:15                      25:20 26:14                      28:19,21                      31:13 37:20                      44:4 46:13                      49:1,4,10,20,                      21,22,24                      53:19 55:10                      56:5 57:15                      74:11 134:19</p> <p><b>working</b>                      29:17 34:12                      43:17 44:13                      55:5,6 62:5,7                      87:5 134:18</p> <p><b>works</b>                      20:5 30:19                      31:1 36:3 41:2                      43:5,12 51:5                      53:3</p> <p><b>write</b>                      27:12 101:10</p> <p><b>writes</b>                      27:13</p> <p><b>writing</b>                      120:17</p> <p><b>written</b>                      123:16 124:21</p> <p><b>wrong</b>                      81:13</p> <p><b>wrote</b>                      101:13,14,16                      103:3 112:12</p> <p><b>www.</b>  <b>snappyautoins</b>  <b>urance.com</b>                      8:18</p> <hr/> <p><b>X</b></p> <hr/> <p><b>Xverify</b>                      129:11,17</p> <p><b>XYZ</b>                      27:22</p> <hr/> <p><b>Y</b></p> <hr/> <p><b>year</b>                      10:5 49:13,15,                      21 59:22                      60:21 61:24</p>	<p>71:21 92:16                      96:19,21,23                      97:6,10,13                      104:2</p> <p><b>years</b>                      8:10,11 9:3,17                      10:5,22 14:21                      15:1,3 16:19                      24:16 25:21                      36:21 38:4                      40:3,7 41:18,                      19 45:19                      46:13 47:20                      49:2,8 51:23                      52:8 53:22                      54:2 59:17                      60:14,16                      61:11 66:7                      73:8 81:17                      82:2 87:4                      96:20 119:3                      124:12 131:10                      134:21</p> <p><b>York</b>                      54:20</p> <p><b>Yup</b>                      71:9 79:2                      91:11 93:4,9                      94:1 100:18,                      22 110:2,11                      112:20 119:16                      122:2 125:4                      135:24</p> <hr/> <p><b>Z</b></p> <hr/> <p><b>zip</b>                      89:7,8 115:4                      116:7,24                      118:5,20</p> <p><b>Zoom</b>                      95:17</p>
---	---	--	---